FILED

### UNITED STATES DISTRICT COURT **EASTERN DISTRICT OF VIRGINIA ALEXANDRIA**

IN RE:

Janice Wolk Grenadier

CASE NO 16/8-00-571 CHERK US CHAIRLET COURT

### COUNTERCLAIM / CROSS COMPLAINT JALEXANDRIA, VIRGINIA CIVIL COMPLAINT

The Culture of the FBI, DOJ, Government & Elected Officials is to COVER UP For EACH OTHER The DOJ and FBI are so afraid of being OUTED that they cannot be TRUSTED **DEMAND FOR A JURY TRIAL** 

JANICE WOLK GRENADIER

15 W. Spring Street

Alexandria, VA 22301

**Plaintiff** 

Vs.

Virginia and the United States Constitutional Rights Federal Constitutional rights under

Title 42 U.S Code §1981 & 1983.

Title 18 U.S. Code § 241 § 242,

Rico and Racketeer Influenced and

Corrupt Organization Act 18 U.S.C § 1961 – 1968

Bill of Rights the 4 Freedoms: speech.

worship, want, freedom of fear Freedom of Speech Obstruction of Justice by DOJ. FBI & many Judges

### **JUDGE HENRY E. HUDSON**

US District Court Eastern District of Virginia (Richmond)

701 East Broad Street Richmond, VA 23219

Defendant

PRESIDENT DONALD J. TRUMP (TRUMP)

1600 Pennsylvania Ave N.W.

Washington DC 20500

**Defendant** 

### DEPARTMENT of JUSTICE aka

ATTORNEY GENERAL JEFF SESSIONS (DOJ) Responsible for the Criminal Activity of: Sarah Isgur Flores, Donald Kempf, Andrew Finch, Joseph Guzinski, Trustee THOMAS P. GORMAN, Chief Judge Honorable Rebecca Beach Smith USDC of Eastern Division of Virginia Judge Leonie M. Brinkema, Judge Gerald Bruce Lee, Judge Liam O'Grady, Judge Anthony J. Trenga, Senior Judge James C. Cacheris, Senior Judge Claude M. Hilton, Senior Judge T.S. Ellis. III. Magistrate Judge Theresa C. Buchanan, Magistrate Judge John F. Anderson, Magistrate Judge Ivan D. Davis, Magistrate Judge Michael Nachmanoff, Magistrate Judge T. Rawles USDC of the Eastern Division of Virginia (Alexandria) Chief Judge Roger L. Gregory, Judge J. Harvie Wilkinson III, Judge Paul V. Niemeyer, Judge Diana Gribbon Motz, Judge William B. Traxler, Jr. Judge Robert B. King, Judge Dennis W. Shedd, Judge Allyson K. Duncan, Judge G. Steven Agee, Judge Barbara Milano Keenan, Judge James A. Wynn, Jr. Judge Albert Diaz, Judge Henry F. Floyd, Judge Stephanie D. Thacker, Judge Pamela A. Harris, Senior Judge Clyde H. Homilton, Senior Judge Andre M. Davis of Appeals Chief Judge Beryl A. Howell, District Judge Emmet G. Sullivan, District Judge James E. Boasberg, District Judge Amy Berman Jackson, District Judge Rudolph Contreras, Senior Judge Royce C. Lamberth, Senior Judge Ellen S. Huvelle, Senior Judge Reggie B. Walton, Senior Judge Richard J. Leon, Senior Judge Rosemary M. Collyer USDC of the District of Columbia Chief Judge: MERRICK B. GARLAND United States Court of Appeals District of Columbia Circuit Judge Brian Kenney, Judge Stephen Mitchell US Bankruptcy Court for the Eastern District of Virginia (Alexandria)

950 Pennsylvania Ave N. W.

Washington DC 20004

Defendant

Federal Bureau of Investigation aka

CHRISTOPHER WRAY (FBI) Responsible for the Criminal Activity of: Marcus Wilson

J. Edgar Hoover Bldg.
935 Pennsylvania Ave N. W.
Washington DC 20004
Defendant

VIRGINIA STATE BAR (VSB) Responsible for the Criminal Activity of: James McCauley (FB Conv Exhibit 20), Seth M. Guggenheim, Barbara Saunders, DaVida Davis, Karen A. Gould, Renu Brennan, James C. Bodie, Kathryn R. Montgomery, Randy E. Webne, Edward L. Davis, Elizabeth K. Shoenfeid, John A.C. Keith, Yvonne S. Gibney (wife of Judge Gibney) Bretta M. Z. Lewis, Sandra M. Rohrstaff, Stephen A. Wannall, Divorce Lawyer Ilona Ely Grenadier Heckman, Ben DiMuro, Michael Weiser, Judge John Tran, Hillary Collyer, Andrea Mosley et al 1111 Main Street Suite 700 Richmond VA 23219

Defendant

**JOHN and or Jane DOE 1-50** 

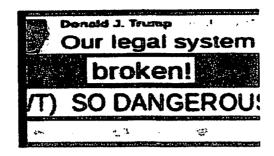
OBJECTIONS TO ALL ALLEGATIONS IN JUDGE HUDSON'S "PERSONAL" SHOW CAUSE
AMERICANS are AFRAID of their JUDICIARY, GOVERNMENT AND ELECTED OFFICIALS
AND SHOULD BE with the POWER they have GIVEN THEMSELVES along with the COVER UP
That by All Appearance was brought due to JWG testifying at Rhetta Daniels VSB Hearing
That the TIMING AND DOCUMENTS will show the appearance that Judge Henry Hudson in
collusion with John Adrian Gibney Jr. to protect Judge Gibney's wives involvement in the
Virginia State Bar - Witch Hunt against JWG's Lawyer Rhetta Daniel
That the hiring of OUTSIDE PROSECUTING Counsel and not using Federal DOJ Counsel

Appearance is a Kangaroo Court / Witch hunt against JWG
FURTHER JWG never received Scheduling ORDERS for Bankruptcy Appeals
Only RECEIVED DISMISSAL ORDERS Even though "SHOW CAUSE" is dated April 9, 2018
One Dismissal just received was DATED April 27, 2018 CASE NO. 1:17-cv-1364 HEH
Again NO SCHEDULING ORDER received

Retaliation and Retribution like Ruby Ridge that the Government is too big to "FAIL" and/or "ADMIT" a mistake for OBSTRUCTION OF JUSTICE AND COLLUSION TO COVER UP THE THEFTS from JWG by: DIVORCE LAWYER ILONA GRENADIER HECKMAN et al THE GOVERNMENT MUST WIN at any COST —

NO different than the Virginia State Bar, the City of Alexandria and the State of Virginia Judiciary, Government, Elected Officials VS. "1" - JWG

<u>Too protect their own:</u> Divorce Lawyer Ilona Grenadier Heckman, Bernard DiMuro - Judge John Tran- Hillary Collery -- Andrea Mosley of DiMuroGinsberg, Michael Weiser, Mohsin Reza, Troutman Sanders aka Mays & Valentine, Ann Schmidt / Reed Smith, Mary Zinser, Howard Bierman et al of BWW Law Group, McCabe Weisberg & Conway, Brock and Scott, et al



That American Citizens by right of the United States Constitution and its clauses of Due Process and Fairness have the right to find Justice in whichever court they can find it. Especially where the Judges show great negligence and the intent of bias to a "Black-Balled" member of the "Old Boys Network" of Virginia. That the State of Virginia, the US District Courts of the Eastern District of Virginia are being run in a Mafia Style Justice System for the Rich and the Powerful. Covering up an Enterprise that I will show is a pattern and practice of STEALING money and Real Estate from many. With Victims having no place to go for help.

Will the Judicial abusive acts and actions of Power make Judges the next Harvey Weinstein type SCANDAL as the Rape of JUSTICE has no different feeling. Abusive Power / Obstruction of Justice by /of Judges is worse than Physical Rape as they are Empowered by so many. JWG being a Rape Victim in college and the man going to jail for several years. The knowledgeable and Deliberate Judicial Abuse of Power / Rape is much worse than Physical Rape.

Rape by Judges last longer and is a longer lasting TRAUMA.

That JWG will show the Pattern of COVER-UP of criminal acts and actions by / of Judge Henry Hudson et al and others to COVER-UP for Wells Fargo, Bank of America, OCWEN, Divorce Lawyer Ilona Grenadier Heckman and the Judiciary, Government and Elected Officials State and Federal along with agencies like the Virginia State Bar, the DOJ and FBI.

"That the appearance of Justice is Just as Important as Justice Itself" as stated in Judge Kloch recusal and letter Exhibit The appearance and JWG believes a safe assumption after 30 years of being a Victim of several Schemes and lies by the "Old Boys Network" of Virginia believes this Show Cause of Judge Henry Hudson and this case was created to protect the above but, especially the Virginia State Bar an Enterprise that steals from many and has much power of what takes place in any and all courts in Virginia.

That the United States of America is on the slippery slope of becoming NAZI America as the DOJ and the FBI cover up for each other and ignore what they have done to JWG and others by marginalizing them and KILLING THEM off when they STAND UP and SPEAK OUT.

Just look at Michael Flynn and Paul Manafort the difference is they still have money for lawyers. But, this Government aka the DEEP STATE will continue till they KILL THEM and or there family.

That JWG will show the timeline that makes this "Show Cause" look like Retaliation and Retribution by Judge Hudson to protect the VSB and the wife of Judge John A. Gibney in a WITCH HUNT against Lawyer Rhetta Daniel who has information no different than Linda Kennedy had. Exhibits 14

That the law is clear any Court, Judge and / or lawyer must report a criminal act of the other. That the Judiciary is a self-reporting enterprise and that is why we have U.S.C § 4 Misprision of a Felony, along with the Professional Code of Ethics and the Judicial Canons to give guideness if needed on appropriate behavior of the profession.

That Judicial immunity is the immunity of a judge from civil action for official activities. It is absolute immunity from liability that is granted to judges and court officers such as grand juries and prosecutors and for tortious acts or omissions done within the scope of their jurisdiction or authority. THIS IMMUNITY is MAN MADE by JUDGES and others to Protect themselves. That Judges, Elected Officials and the Government POLICE THEMSELVES and HAVE GIVEN THEMSELVES IMMUNITY is pure "BULLSHIT". This type of "BULLSHIT" makes a country a "SHIT HOLE"

This Slippery Slope started with this when one or many men can STATE "I AM ABOVE THE LAW: I am a JUDGE, Elected Official and or Work for the Government. What a person has doesn't make them - it is what the person has in there HEART and SOLE that makes them. As I tell my children and others often we come into the world with nothing and leave with nothing - EVERYTHING in between is a GIFT.

That the Retaliation and Abuse of Power to protect the INTENTIONAL Knowledgeable Criminal acts that are malicious and with gross negligence lacking in all candor. These acts and actions against JWG and others must stop today, and can no longer be ignored.

### INTRODUCTION - TAKEN FROM RELATOR SUIT EXHIBIT 9

COMES NOW on January 20, 2017 Donald J. Trump was sworn in to office of the President of the United States of America. On or Around February 2nd and 3rd Plaintiff and others would file in the USDC of the Eastern Division of New York (Brooklyn) and the USDC of the Eastern Division of Virginia (Alexandria) as Intervener's in support of President Donald J. Trump.

That reported by the President and lived by Janice the fact and knowledge of the corruption in the United States of America starts in our courts and STARTS WITH OUR JUDGES. That this suit is filed with personal and factual knowledge of a Judge's rulings in court is made by who buys him Breakfast, Lunch, Dinner or a weekend getaway and or sex. That the federal funding that goes into the State of Virginia, the City of Alexandria and the above courts and other courts as seen fit should be immediately stopped due to the Civil Rights Discrimination against Plaintiff and others in the United States of America. That Plaintiff has since on or around September 12, 2007 trying to get Justice from Divorce Lawyer Ilona Ely Freedman Grenadier Heckman a lawyer founding partner of Grenadier, Anderson, Starace, Duffett & Keiser PC,

widow to Judge Albert Grenadier and his 1st cousin Jerome Heckman, founding partner of Keller Heckman an International law firm. Ilona has LIED IN COURT, LIED IN COURT

DOCUMENTS. The Slippery Slope of the Judicial Misconduct, Criminal Misconduct, and Discrimination for Religious, Social, Economic and Hierarchy, the Gang type behavior similar to the Klu Klux Klan — the Collusion of the Defendants began to cover up the Lies, the attempt to harm Plaintiff and her girls American Born Citizens through by all appearance murder for hire, drugs and rape, to Slander Plaintiff, to prevent Due Process.

The purpose to prevent one of their own Ilona Grenadier Heckman from being held accountable for: a criminal spree started in or around November of 1983, Ilona a Lawyer is guilty of the following:

Perjury, Obstruction of Justice, Aiding and abetting obstruction of Justice, Fraud on the Court, Involvement of Forgery, Theft of money from the Sonia Grenadier Trust account through her law office for great personal gain over \$10 Million in Real Estate, Theft of Herman Grenadier, joint and several liability, malpractice, Bribery, Abuse of her Oath of Office, Conspiracy, Collusion, Gang like activity mirror image to the Klu Klux Klan, Miscarriage of Justice, preventing Due Process, conflict of interest - related to the practice of law, violating code of ethics, has liability to her victims, has violated Plaintiffs Religious, Political, Social, United state Constitutional, Virginia Constitutional and Civil Rights, Breach of Fiduciary Duties, Violating RULES OF PROFESSIONAL CONDUCT, Title 18 US Code 241 Conspiracy against rights, and 242 Deprivation of rights under color of law, Retaliatory & Retribution actions, Treason, Title VI Civil Rights Act of 1964 Title VI, 42 U.S.C. 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964, 18 USC § 912. With her Intention to 18 USC § 1341 - Frauds and swindles, Defraud, Breach of Contract, Arbitrary and Capricious behavior, Committed Fraud on the Court, § 18.2498.3. Misrepresentations prohibited, § 18.2-172 - Judicial Misconduct; Criminal Misconduct; Mail Fraud; Honest Services Fraud; Extortion; Harassment; Gang activity; Racketeering; Retaliation; Discrimination; et al. not limited to: decisions made in bad faith for a corrupt purpose, deliberately and intentionally failing to follow the law; Extrinsic fraud; Egregious legal errors; Violation of Procedural Rules; Violation of Due Process; uttering, etc., other writings et al.

All of above charges will and can be proven with letters, documents, witnesses who have also been harmed by the actions of Plaintiff and other crimes.

This case started out a domestic issue, TODAY THIS IS AN AMERICAN ISSUE, An issue that concern all American 'Fairness in the courts and Equal Justice for all Americans: the right of access to the courts to a pro se litigant or any litigant without having their life threatened by the Collusion, Racketeering type Enterprise of the Judicial Community.

That the Judicial Community polices itself, that Plaintiff has gone through all channels for help, to be turned away. The Judicial Community has created a smoke and mirrors of Immunity that they have tried to force on

the American people, to believe that they are above the law and cannot be held responsible for their actions in the courtroom. This is untrue. That the immunity is lost for actions that are for personal gain, that are willful acts that are and were malicious, violent, oppressive, fraudulent, wanton and grossly reckless. That Discrimination is color blind that there is discrimination for social, economic and hierarch

that exists in the Judicial Community to protect one of their own. That Judges do go to jail for Obstruction of Justice, Violations of the only 6 rules they have under the Judicial Canons, along 18 USC § 4 Misprision of a Felony is clear of the criminal acts and actions Of Judges and others in the Government and Elected Officials who work to Cover Up the criminal actions of others.

That was has become very clear is that there the Defendants have a perception that they need to show the World that they are working for FREEDOM, when in fact it is nothing more than a smoke and mirrors as they are saying one thing and doing another. That the Defendants are fighting for rights, as our military goes into other Countries to fight for rights that the above Defendants with knowledge deny the citizens of the United States of America. That when our president tweeted out the following:



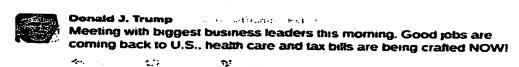
Countries charge U.S. companies taxes or tariffs while the U.S. charges them nothing or little.We should charge them SAME as they charge us!





Donald J. Trump

Professional anarchists, thugs and paid profesters are proving the point of the millions of people who voted to MAKE AMERICA GREAT AGAIN!



32





Which shows the most Powerful man in our country has a real understanding why he was elected and of the Collusion and Corruption starts with our Judges who have decided to try and Rape our President of the United States of America the power to keep the citizens of America safe.

That further the collusion of lawyers to line their pockets with little regard to the law and what is best for the public is evident in the article in the Daily Business Review www.DailyBusinessreview.com which quotes the ABA President Linda Klein where she Rails against Trump Tweets attacking Judges who Blocked Ban: "There are no 'so-called' judges in America," Klein said. "There are simply judges, fair and impartial. And we must keep it that way."

Klein who you can tell is out of touch with what is really happening in America and in the Courts further stated: Klein also cheered lawyers around the country who flocked to airports where immigrants were detained after

Trump signed his executive order. She said lawyers would insist on the right to due process and legal representation, including hearings from impartial immigration judges, for those who face deportation.

The ABA launched a website, www.immigration justice.us, to help lawyers volunteer to support immigrants. The website, set up in just one afternoon, links to relevant law, habeas corpus resources, how-to-help guides and volunteer forms.

As I JWG receive e-mail after e-mail asking for donations to give rights to others that as an American Citizen have been denied me born into America in May of 1959.

Further: "Pro se plaintiffs are often unfamiliar with the formalities of pleading requirements. Recognizing this, the Supreme Court has instructed the district courts to construe pro se complaints liberally and to apply a more flexible standard in determining the sufficiency of a pro se complaint than they would in reviewing a pleading submitted by counsel. See e.g., Hughes v. Rowe, 449 U.S. 5, 9-10, 101 S.Ct. 173, 175-76, 66 L.Ed.2d 163 (1980) (per curiam); Haines v. Kerner, 404 U.S. 519, 520-21, 92 S.Ct. 594, 595-96, 30 L.Ed.2d 652 (1972) (per curiam); see also Elliott v. Bronson, 872 F.2d 20, 21 (2d Cir.1989) (per curiam). In order to justify the dismissal of a pro se complaint, it must be "beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief.' "Haines v. Kerner, 404 U.S. at 521, 92 S.Ct. at 594 (quoting Conley v. Gibson, 355 U.S. 41, 45-46, 78 S.Ct. 99, 102, 2 L.Ed.2d 80 (1957)).

That the Relator Suit was served to the DOJ, the FBI, the State of Virginia AG and the City of Alexandria, with the Judge Dismissing without responses. Exhibit No. 9

### **JURISDICTION**

This court has jurisdiction under 28 U.S.C. § 1331 a case arising under the United States Constitution or Federal laws or treaties is a federal question case. This court also has jurisdiction under 28 U.S.C. § 1332. The loss of JWG is over \$150 Million and or more - as How do you put a price on JUSTICE? Or having your life stolen from you so JUDGES can protect their own?

That Judge Henry Hudson lost Jurisdiction when JWG found his book "Quest for Justice" and his collusion with the parties that JWG complains about in Case No. 1:17-cv-1106.

### PARTIES OF THE CASE

Plaintiff JANICE WOLK GRENADIER – (JWG) VICTIM to the Virginia Judiciary, Government and Elected Officials since on or around 1998. Unknown to JWG this was a SCHEME that was instigated by her x-husband David Grenadier and his mother Divorce Lawyer Ilona Grenadier Heckman. The late Judge Albert Grenadier is the father to David and Ilona is the widow to Judge Albert Grenadier and his 1st Cousin Jerry Heckman of Keller and Heckman. That JWG is owed over \$20 Million from the Enterprise of the Conversion of Real Estate with knowledgeable intent by Divorce Lawyer Ilona Grenadier Heckman who's CRIMINAL SPREE can be

traced back to in or around 1983. That it has taken much Courage<sup>1</sup> to Stand up and Speak out against the "GANG" assembled by Divorce Lawyer Ilona Grenadier Heckman to harm JWG physically, mentally and financially.

**Defendant JUDGE HENRY HUDSON:** Author to "QUEST of JUSTICE" where on page brags about lying to the Court - See Motion for Henry Hudson to Recuse.

Defendant PRESIDENT DONALD J. TRUMP: It is with great sadness I include our President of the United States. But, he has not been kept updated by those who work for him on the DEPTH of the DEEP STATE in Virginia and the need of the Federal Government under him, the need for policing. The facts will show the need to have the Presidents intervene for Justice for many.

Defendant ATTORNEY GENERAL JEFF SESSIONS: That many under Jeff Sessions, such as: Sarah Isgur Flores, Donald Kempf, Andrew Finch, Joseph Guzinski, is aware of and are in direct conflict of the law and rules of Professional conduct. That JWG will be able to prove the peddling of Justice by Higher UPS in the bars of DC - "SEX for JUSTICE in the DOJ" and then when you go and ask them to do there job - only their job they refuse. THE DOJ BELIEVES they are ABOVE the LAW and PROFESSIONAL CODE OF CONDUCT. Appearance is the DOJ are in collusion to cover up. Including and not limited to: Chief Judge Honorable Rebecca Beach Smith USDC of Eastern Division of Virginia Judge Leonie M. Brinkema, Judge Gerald Bruce Lee, Judge Liam O'Grady, Judge Anthony J. Trenga, Senior Judge James C. Cacheris, Senior Judge Claude M. Hilton. Senior Judge T.S. Ellis, III, Magistrate Judge Theresa C. Buchanan, Magistrate Judge John F. Anderson, Magistrate Judge Ivan D. Davis, Magistrate Judge Michael Nachmanoff, Magistrate Judge T. Rawles Jones, Jr. USDC of the Eastern Division of Virginia (Alexandria) Chief Judge Roger L. Gregory, Judge J. Harvie Wilkinson III, Judge Paul V. Niemeyer, Judge Diana Gribbon Motz, Judge William B. Traxler, Jr. Judge Robert B. King, Judge Dennis W. Shedd, Judge Allyson K. Duncan, Judge G. Steven Agee, Judge Barbara Milano Keenan, Judge James A. Wynn, Jr. Judge Albert Diaz, Judge Henry F. Floyd, Judge Stephanie D. Thacker, Judge Pamela A. Harris, Senior Judge Clyde H. Hamilton, Senior Judge Andre M. Davis Fourth Circuit Court of Appeals Chief Judae Bervi A. Howeil. District Judge Emmet G. Sullivan, District Judge James E. Boasberg,

District Judge Amy Berman Jackson, District Judge Rudolph Contreras, Senior Judge Royce C. Lamberth, Senior Judge Ellen S. Huvelle, Senior Judge Reggie B. Walton, Senior Judge Richard J. Leon, Senior Judge Rosemary M. Collyer USDC of the District of Columbia Chief Judge: MERRICK B. GARLAND United States Court of Appeals District of Columbia Circuit

Judge Brian Kenney, Judge Stephen Mitchell US Bankruptcy Court for the Eastern District of Virginia (Alexandria)

Under DOJ JUDGE BRIAN KENNY: JWG / Plaintiff / Debtor had been assured not once but several times by the Free Legal Advisors: Craig Young and that Judge Kenny had to recuse as he was being sued in Case No. 1:17-cv-

<sup>&</sup>lt;sup>1</sup> Courage (Courage (also called bravery or valour) is the choice and willingness to confront agony, pain, danger, uncertainty, or intimidation. Physical courage is bravery in the face of physical pain, hardship, death or threat of death, while moral courage is the ability to act rightly in the face of popular opposition, shame, scandal, discouragement, or personal loss.) So the Injustice does not happen to someone else.

1106 in the USDC of the Eastern Division (Alexandria). That JWG exposed to Judge Kenny et al and he has a responsibility to report such criminal activity – instead he is Covering it up with the help of Trustee Thomas Gorman and the Department of Justice Joseph Guzinski and others. Exhibits 7 & 8

*Under DOJ TRUSTEE THOMAS P. GORMAN:* Trustee who has pointed out the corruption to the Judge in the transcripts in court. Also changed the Show Cause from In Rem because I had been candid and he believe honest. Exhibits 7 & 8

Defendant FBI CHRISTOPHER WRAY: Boss to Agent Marcus Wilson and all at the FBI, Marcus on different occasions informed JWG that he would have someone contact her and others. That the appearance is that in 2014 the "7th" Floor of the FBI took over all Judiciary, Government and Elected Officials reports on corruption for the State of Virginia. The appearance is to control for Hillary Clinton and her colleagues in Virginia Politics a for sure win with no Scandals and no investigations into the corruption as reported in the press.

The payoff for Comey was several accolades and unknown by the Richmond School of Law. A FOIA request for information has been filed.

The payoff for McCabe was to his wife or through his wife by all appearance. The many others are slowly coming out / but, by all appearance with the help of the DOJ still on the taxpayers dime and not being disclosed.

The Question is and should be did this Press Release begin the COVER UP and COLLUSION of McCabe / Comey and the Democrats to COVER UP the crimes of the Judiciary, Government and Elected Officials:

### **FBI Creates Northern Virginia Corruption Tip Line**

### Published at 7:43 PM EST on Feb 19, 2014

The FBI announced Tuesday they have created a hotline for tips regarding public corruption in Northern Virginia.

"This campaign is focused purely on Northern Virginia, as the FBI's Washington field office has jurisdiction for the five counties in Northern Virginia," Timothy Gallagher with the FBI said. According to the FBI, it is looking for corruption tips surrounding public employees including:

- Government officials such as DMV employees, city inspectors, taxing or zoning assessors or other regulatory agency employees, or even town councils or mayors:
- Contracting officials at all levels, including those who manage government contracts or regulatory permits; or, school resource officers who manage school accounts:
- Local officials colluding with real estate investors to rig the bidding process at foreclosure auctions:
- A person representing the judicial branch a judge, member of the jury or court personnel;
   or.
- A person representing law enforcement, who steals drugs from criminals, embezzles government funds, falsifies records or smuggles contraband.

"We really do depend on the community to report things that may be against the law," Fairfax County Chairman Sharon Bulova said.

The tipline was sparked by recent incidents of corruption including a DMV employee pleading guilty to accepting bribes to process applications for more than 100 undocumented immigrants. According to Gallagher, the tipline did not stem from corruption charges former Virginia Governor Bob McDonnell is now facing.

If you have a tip, you can contact the Northern Virginia Public Corruption Hotline at 703-686-6225 and e-mail at NOVAPC@ic.fbi.gov.

SAC Gallagher seems to be a good friend and tool for James Comey:

Washington, D.C. FBI National Press Office (202) 324-3691

Twitter Facebook .... Email

February 24, 2016

# Timothy Gallagher Named Special Agent in Charge of the Newark Division

FBI Director James B. Comey has named Timothy Gallagher as the Special Agent in Charge of the Newark Division. Mr. Gallagher most recently served as a deputy assistant director in the Criminal Investigative Division.

Mr. Gallagher joined the FBI in 1996. He began his career in the Canton Resident Agency, Cleveland Division, where he Investigated all criminal matters. He also served a member of the evidence response team. Throughout his career, Mr. Gallagher has held leadership positions in the Criminal Investigative Division, Kansas City Division, Inspection Division, the Washington Field Office, and the Cyber Division.

Mr. Gallagher earned a Bachelor of Science degree in economics from St. Peter's Coilege in New Jersey. Mr. Gallagher will assume this new role at the end of March.

FBI agent Marcus Wilson and JWG have taped conversations on the fact the <u>FBI in Virginia was not allowed to investigate Virginia Judiciary</u>, <u>Government and Elected Officials corruption</u> - that corruption went to DC ie: in my opinion and by all appearance to COMEY and MCCABE who were both receiving directly or indirectly aculates and money to COVER UP the criminal activity directly or indirectly associated

with HILLARY CLINTON. (that after several attempts on JWG life starting in September of 1997 to being in the hospital October of 2017 after being poisoned - states this knowing her life if even further in danger - by the Clinton death count) Exhibit 22

Defendant VIRGINIA STATE BAR: That since on or around 2008 / 2009 have ignored complaints of Judges, Attorneys who have lied in court, lied in court documents, created an Enterprise aka SCHEME to allow lawyers to steal money and Real Estate from Sonia Grenadier and JWG et al. That on or around Rhetta Daniel became JWG lawyer. JWG would testify at here hearing only to have the transcripts tampered with and for the Bar to create a witch hunt against JWG's lawyer Rhetta Daniel. Those that should be investigated and will be called to testify include and are not limited to: James McCauley (FB Conv Exhibit 20), Seth M. Guggenheim, Barbara Saunders, DaVida Davis, Karen A. Gould, Renu Brennan, James C. Bodie, Kathryn R. Montgomery, Randy E. Webne, Edward L. Davis, Elizabeth K. Shoenfeid, John A.C. Keith, Yvonne S. Gibney (wife of Judge Gibney) Bretta M. Z. Lewis, Sandra M. Rohrstaff, Stephen A. Wannall. The State of Virginia has no oversight over the VSB. Including and not limited to the COVER UP of: Divorce Lawyer Ilona Ely Grenadier Heckman, Ben DiMuro, Michael Weiser, Judge John Tran, Hillary Collyer, Andrea Mosley et al

JOHN and or Jane DOE 1-50: To be determined

### STATEMENT of FACTS FOR SHOW CAUSE

That all Cases filed: in the Federal Bankruptcy, in the USDC of the District of Columbia, the US District of Columbia Appeals Court, the USDC of the Earthen Division of Virginia and the Fourth Circuit Appeals Court, the Supreme Court of the United States of America (SCOTUS) all documents are incorporated into the Defense of JWG in the Show Cause to show the Pattern and Practice of Collusion, OBSTRUCTION of JUSTICE by Judges to protect their OWN.

That the JUDGES in using SLANDERS STATEMENTS and WORDS - no different than BULLYING should be ignored by ALL and instead JWG should be looked at as someone with COURAGE<sup>2</sup> to STAND UP and SPEAK OUT against these BASTARDS.

That this Show Cause was created to protect the VSB and many in the Judiciary whom have from the outing of criminal activity / the Collusion and the Corruption of the Judiciary going against JWG. As with President Nixon and many others it is not the Crime that you lose by - it is the COVER UP which is DEEP in this situation.

<sup>&</sup>lt;sup>2</sup> Courage (Courage (also called bravery or valour) is the choice and willingness to confront agony, pain, danger, uncertainty, or intimidation. Physical courage is bravery in the face of physical pain, hardship, death or threat of death, while moral courage is the ability to act rightly in the face of popular opposition, shame, scandal, discouragement, or personal loss.) So the Injustice does not happen to someone else.

That this Show Cause is Retaliation and Retribution for testifying in support of Rhetta Daniels with the VSB - you can not ignore the dates and the fact Judge Henry Hudson never sent JWG any scheduling ORDERS only Dismissal Orders and the last one being received on Wednesday May 2, 2018 signed on April 27, 2018 just like the other 3 received by the Bankruptcy court Dated February 26, 2018 from the Bankruptcy Court (JWG is not sure the exact date she received them)

That in the Bankruptcy Case 16 - 13828 a situation similar occurred due to the receiving of the scheduling Orders late.

That the Scheduling Orders were never received by JWG on the Bankruptcy Cases that Judge Hudson used to CREATE this KANGAROO COURT of RETALIATION and RETRIBUTION against JWG.

That JWG has filed suit for good reason. That several Judges have recused themselves Exhibit 13. That Divorce Lawyer Ilona Grenadier Heckman received by all appearance close to \$100,000 a month in Real Estate rental income prior to expenses that 24,5% belongs to JWG and my girls. That David and I were divorced in 2000. That Ilona and David have used their name and the POWER that comes with being the son and widow of Judge Albert Grenadier to win in court. That JWG is owed for the SCHEME that Divorce Lawyer Ilona and David created since the death of Judge Albert Grenadier to steal from his mother and his sister / her children in the millions of Real Estate and Money. That their "HATE" of JWG and my girls as Ilona stated very clearly in the court on or around May of 2008 "Me and my family had nothing to do with you and your girls because you raised them Catholic" Ilona's GANG e-mail supported by the Courts et al Exhibit 22:

December of 2013 - Ilona Grenadier Heckman and Presidential Candidate Loretta Lax Miller do a "HATE OF CATHOLICS, CHRISTIONS et all Blog - jwgrenadierisalair.blogspot.com taken down while Janice is in lail.

From: LeahLax1234@aci.com < LeahLax1234@aci.com > To programades degramas com

Tue. Dec 24, 2013 at 2:05 PM

### want to hear something more scarier I contacted Ilona Ely Freedman Grenadier Heckman your witch hunt is over

From: LeahLax1234-a aol.com 4To: jwgrenadier@gmail.com

Tue, Dec 24, 2013

YOU KNOW WHAT YOU DIDN'T HELP JEWS YOU ARE THE KIND THAT WOULD TURN
THEM IN BECAUSE ONE PERSON DID SOMETHING TO YOU THAT WAS JEWISH YOU MADE YOUR BED AND YOU LIED IN IT! THIS FAMILY REJECTED YOU FOR NOT BEING JEWISH, YOU STUPID GOY, YOU WERE REJECTED., GET THAT INTO YOUR THICK SKULL NOWYOU ARE MAKING UP STORIES AND SPREADING

LIEST BLAMING ALL JEWS LIKE HITLER FOR NOT LIVING ON EASY

STREET, WELL GET OFF YOUR ASS. GOOD YOU LOSTALL YOUR MONEY MAKES YOU HUMBLE. AND GOOD YOU GOT A WHIPPING FROM A JEWISH LAWYER WHO WAS SMARTER THEN YOURS, GOOD FOR HER. I WOULD HIRE HER IN A HEART BEAT SHE WENT AFTER A JEW HATING NAZI AND SHE WON, AND I HOPE SHE GAVE HER GRANDSON A GOOD TALKING TO FOR MARRYING A GOY IN THE FIRST PLACE AND HE SHOULD HAVE KEPT HIS ZIPPER UP AND NOT HAVE HAD SEX WITH A MENTALLY SICK PIECE OF CRAP LIKE YOU. YOU ARE THE NAZI WORSE A MUSLIN LOVING NAZI! YOU HATE

YOURSELF THAT IS WHY YOU HATE JEWS YOU ARE BLOCKED!

There are many other e-mails, blogs et al that have been done on JWG that are not truthful. JWG does have a blog www.VALaw2010.blogspot.com that exposes the TRUTH, not lies about what is being done and has been done to her.

That Judge Hudson on April 12, 2018 was clear to Lawyer Rhetta Daniel Exhibit # 18 that she had to prove Jurisdiction. Jurisdiction is a hurdle that a Judge and or Court must pass before it can rule in a case. Judge Hudson does not have Jurisdiction due to BIAS and his book "The Quest of Justice".

# Response to EACH PARAGRAPH OF SHOW CAUSE ORDER TO SHOW CAUSE

On November 6, 2017, United States Bankruptcy Judge Brian F. Kenney certified the matter of Janice Wolk Grenadier to the District Court for criminal contempt proceedings. (Certification, Bankr. Case No. 17-13354-BFK, ECF No. 48.) Having determined that civil contempt is a more appropriate avenue by which to proceed, the Court initiated this miscellaneous case.

In his Certification, Judge Kenney made the following findings of fact:1

It appears that the Criminal Contempt was DISMISSED according to this Show Cause. The request would be quashed due to Judge Kenny not having Jurisdiction due to being sued in Case No. 1:17 -cv- 1106 HEH.

1. Grenadier has filed ten bankruptcy cases to date: 98-10042; 99- \* 81080; 00-11592; 07-11602; 08-11841; 09-11348; 12-12665; 13-10791; 16-13028; and 17-13354.

That in my bankruptcy - the LAWYERS AND JUDGE MITCHELL allowed the lawyers to lie in court and lie in court documents and Judge Mitchell admitted that he (Judge Mitchell) did not believe or at least found conflict with the documents and testimony of lawyers. This is why we are in court still. The Judge Mitchell left lawsuits open because the documents spoke for themselves and Judge Mitchell knew for fact as the documents show the LAYERS - Ann Schmidt and Divorce lawyer Ilona Grenadier Heckman mislead the court and LIED to the court in documents and in testimony. Obstruction of Justice by Judges and lawyers

That never have I filed because I did not have the law on my side and the Banks, Divorce lawyer Ilona Grenadier Heckman et al have not done things that I deserved a fair hearing and have never had. The two open court hearings in Federal Court since 2008 the Transcripts attached

show I have been honest and the documents show the Criminal activity against me that is being ignored to protect one of their own.

2. In the penultimate bankruptcy case, 16-13028, the Bankruptcy Court dismissed Grenadier's claims with prejudice for a period of two years because Grenadier did not have regular income, a statutory requirement for filing Chapter 13 bankruptcy.

That JWG testified in Exhibit 7 & 8 under oath and the comments by the Trustee Gorman that JWG was CANDID and HONEST not like the Judges et al have been.

3. However, the Court permitted Grenadier an "out": if Grenadier secured regular income in that two-year period, she could file a Motion and Affidavit representing her ability to satisfy the Chapter 13 requirements.

That JWG due to the "GANG" that Divorce Lawyer Ilona Grenadier with the help of lawyers by all appearance Ben DiMuro / Judge John Tran / Hillary Collyer et al and Michael Weiser et al hiring people to physically and mentally harm JWG along with her girls Exhibit 22 outline That JWG is due over \$20 Million illegally stolen from her with income of approx \$20 thousand a month or more due her for the last 20 years. But, she is denied any case to show proof.

4. Grenadier was present in court on October 13, 2016, when the Court imposed the two-year filing bar.

That Exhibit 7 transcript shows the testimony and that the Judge and Trustee where aware of the Judicial Misconduct, the Obstruction of Justice my many and bay all appearance have ignored their obligations under the law to report no different than what Judge Henry Hudson has done.

5. Grenadier filed a motion to reconsider the dismissal of her case; when the Bankruptcy Court denied this, she appealed both the Order dismissing her case and imposing the bar and the Order denying the motion to reconsider to the United States District Court, which affirmed the judgment of the Bankruptcy Court. (Civil Nos. 1:16cv1436; 1:16cv1461.) She then appealed the District Court's rulings to the Court of Appeals for the Fourth Circuit, which dismissed the appeals. (USCA Case No. 17-1737.)

The  $4^{th}$  Circuit has lost Jurisdiction due to the Suit of 1:17-cv-1106 HEH yet the Judges are ignoring the law and the Judicial Canons to protect themselves.

6. On October 4, 2017, less than one year after the imposition of the two-year bar, Grenadier filed the bankruptcy case that ultimately gave rise to Judge Kenney's present certification, Bankr. Case No. 17-13354.

That Judge Kenney should have recused himself is ignored, further that Judge Kenney has violated the law when he did not report the Corruption that JWG was found to be creatable and the documents filed in all courts show is true. That again JWG has monthly income being blocked by the Judges.

7. Despite the terms of the two-year filing bar, Grenadier did not file a Motion and Affidavit prior to filing Bankr. Case No. 17-13354, and at the subsequent Show Cause hearing before Judge Kenney, she acknowledged that she still lacked employment and regular income.

That JWG filed in that court and the good friend of Judge Kenny dismissed was Counter Claim Exhibit # which goes into detail as to the collusion of Judges and others to harm JWG and to deny any and all due process. That JWG Constitutional rights to a Fair Trial have been denied in all FEDERAL COURTS which makes this Show Cause a JOKE. JWG was never sent or served Scheduling Orders.

8. In addition to filing the ten abovementioned bankruptcy cases and disregarding the Court's filing bar, Grenadier has also filed a plethora of civil suits in the District Court against, *inter alia*, almost fifty sitting and retired judges, the Clerk of

the Alexandria Circuit Court, the United States, the Commonwealth of Virginia, the City of Alexandria, various private attorneys, a private law group, a loan servicer, and various banks. See Grenadier v. Smith, et al., Civil No. 1:17cv1106; Grenadier v. Ocwen Loan Serv'g, LLC, et al., Civil No. 1:17cv925; Grenadier v. Clark, Civil No. 1:17cv280; Grenadier v. Virginia, Civil No. 1:17cv166; Grenadier v. U.S., Civil No. 1:15cv1497; Grenadier v. BWW Law Group, et al., Civil No. 1:14cv827; Grenadier v.

Semonian, et al., Civil No. 1:11cv1136. None of these suits have been successful.

Judge Henry Hudson is correct on the above cases. But, what he fails to disclose is that JWG showed in Motions to DISMISS the Judges for conflict including and not limited to the possible appearance of Judge Anderson and Divorce Lawyer Ilona Grenadier Heckman in a personal relationship that JUDGE CLAUDE HILTON RECUSED HIMSELF and 3 case all his ORDERS FOR DISMISSAL ARE OR SHOULD be VOID AND OR VOIDABLE

There are always two sides to every story – THE JUDGES IN FEDERAL AND STATE COURT HAVE SLANDERED JWG FOR YEARS FOR TELLING THE TRUTH SUPPOSIDLY YOUR BEST DEFENSE!

Judge Kenney's findings of fact show that Grenadier has a history of abusing the legal process. This is supplemented by Grenadier's own recitation of her long history of litigation in Virginia state courts. See Compl. 19–44, Grenadier v. State of Virginia, Civil No. 1:17cvl66, ECF No. 1 (providing a running narrative of her litigation in the courts of Virginia).

JWG does not deny standing up and speaking out and SEARCHING FOR JUSTICE which is her GOD GIVEN RIGHT IN THE UNITED STATES OF AMERICA. But, JWG is now POOR and it has been made clear to her that she is no longer party to the VIRGNIA OLD BOYS NETWORK and has no legal rights according to the Judiciary, Government and Elected Officals.

Grenadier's numerous and duplicative filings create a burden on the courts.

"Every paper filed with the Clerk of this Court, no matter how repetitious or frivolous, requires some portion of . . . the institution's limited resources." *In re McDonald*, 489

U.S. 180, 184 (1989). This Court has a duty to ensure that the Court's limited resources

are used "in a way that promotes the interests of justice." *Id.* Allowing Grenadier to continue to file actions, and numerous motions within those actions, does not promote the interests of justice, especially when, in doing so, Grenadier flouts court orders barring further filing.

This BURDEN has been created by the Judges. All Janice asked for was an open court trial to present her evidence to Jury of her peers — Why can't she get that? What is the Court Covering up — denying such hearing? Why is Judge Ellis III so concerned for Manaforts rights and not JWG? JWG in the Relator Suit and this suit exposes the corruption of many in the DOJ, FBI and the collusion that has been ignored.

Accordingly, Grenadier is ORDERED to APPEAR and SHOW CAUSE at a hearing before this Court why the Court should not find her in contempt of the Bankruptcy Court's filing bar, and further why the Court should not impose a system of prefiling review for any further actions she wishes to file. Subject to such review, Grenadier may not file any civil action in the United States District Court for the Eastern District of Virginia or the United States Bankruptcy Court for the Eastern District of Virginia without leave of Court. If Grenadier wishes to file an action in the Eastern District of Virginia, Grenadier shall submit a Motion for Leave to File a Complaint, along with a proposed Order for the Court's use. The Motion shall identify the nature of the proposed lawsuit, the parties involved, and a brief statement of her claims against the defendants.

JWG and her witness's will show up in Court. JWG has never not shown up — It is the Judges who have not shown up to do their job in all the above listed cases.

Pursuant to the prefiling injunction, the Court will review the Motion to determine whether Grenadier's proposed suit is meritless, vexatious, or repetitious. If the Court determines that the proposed suit is without merit, vexatious, or repetitious, the Court will deny leave for Grenadier to file a new complaint. Moreover, if Grenadier is allowed to proceed with an action and it is later determined that the Complaint is in fact baseless, vexatious, or repetitious, Grenadier will be subject to the possibility of sanctions after an opportunity to show cause, as justice so dictates.

This Court has no desire to impinge upon Grenadier's right to seek redress for actual wrongs that might be done to her. If Grenadier presents a meritorious claim, she will receive all the consideration due any litigant in this Court. However, the Court cannot countenance Grenadier's use of the court systems and taxpayer money to carry on a crusade against her ex-husband's stepmother and other persons.

THIS COURT HAS EVERY DESIRE AND THE ACTS AND ACTIONS OF ALL DEFENDANTS HAVE ignored and DENIED all the RIGHTS OF JANICE WOLK GRENDIER. This is in support of a LYING LAWYER WHO HAS SCHEMED TO STEAL MILLIONS AS JUDGE HUDSON REFERS TO ABOVE. The question becomes how close of friends are Judge Hudson and Divorce Lawyer Ilona Grenadier Heckman

The hearing shall be held on May 22, 2018, at 10:60 a.m. at the United States District Court for the Eastern District of Virginia, Alexandria Division, located at 401 Courthouse Square, Alexandria, Virginia, 22314. Grenadier may wish to obtain counsel prior to the hearing; because this will be a civil, not criminal, proceeding, the Court is not obligated to provide her with counsel, and the right to counsel is not otherwise guaranteed. Cromer v. Kraft Foods N. Am., Inc., 390 F.3d 812, 821 (4th Cir. 2004).

That the Judges are aware JWG cannot afford Councel. But, more important why has the Court gone outside the DOJ for councel. Why has a man who has admitted to lying to the entire Virginia Assembley, Questionable integrety with Ruby Ridge and incarcerated knowingly a slightly retarded person for a murder he did not commit car about procedure. The appearance is also Judge Hudson was involved in the COVER UP of the monies stolen by Divorce Lawyer Ilona Grenadier Hackman in the law suit of Jim Arthur.

Let the Clerk of the Court file this Order electronically, send a copy to the Clerk of the Court for the Alexandria Division of the United States District Court and the Clerk of the Court for the Alexandria Division of the United States Bankruptcy Court, and provide a copy to the U.S. Marshals for personal service upon Grenadier.

It is so ORDERED.

Henry E. Hudson

United States District Judge

Date: April 12, 2018
Richmond, Virginia

## CLAIMS From RELATOR SUIT that was served and CLAIMS have not changed CLAIM 1

The False Claims Act 31 USC § 3729 (a)

That the Defendants and their agents have defrauded the government and its programs by ignoring the law, falsifying documents, illegally jailing and using the Judiciary, the Government and Elected officials to Cover Up for each other ignoring the rights of American Citizens...

That when a person takes an Oath of Office to uphold the United States Constitution and to insure Fairness in the Courts to all Americans, and then act in conflict under the law and rules they lose any and all immunity.

Further when an Officer of the Court, an Elected Official or a Government Employee act in collusion s the Defendants and their agents have to Cover Up the criminal spree of Divorce Lawyer Ilona Grenadier Hackman, they defrauded the Government of funds put into programs, the courts and other agencies that programs should be available to all citizens not just immigrants entering the country.

That if the United States does not step in and step up to enforce the guarantee of all rights to all American Citizens then we lose as a nation as we are doing right now.

CLAIM 2
The Hobbs Act

That the State of Virginia agents through force, mentally and physically have tried to silence Plaintiff and steal Real Property from Plaintiff / Relator to enrich one of their own Divorce Lawyer Ilona Ely Freedman Grenadier Heckman who through contributions and others has used bribery in getting the Judge's to rule in her favor.

That Plaintiff due to the acts and actions of the Defendants has created a situation that Plaintiff / Relator lives her life in Fear. That she has not felt safe and should not feel safe with all the threats on her life and the responsibility of the Defendants to protect Plaintiff has done just the opposite. That they have stated clearly through their agents that more powerful agents have told the Police et al they are not to take reports.

That DOJ Joseph Ginzinski made it clear he was too afraid of the Retribution / Retaliation of doing the right thing from his boss. When asked who that would be he stated very clearly "the President of the United States" which at the time was President Obama.

Further when the Magistrate in the City of Alexandria Jail threatened harm to Plaintiff girls while illegally jailed showed further how far they would try extortion on one's emotional state to control Plaintiff.

#### **CLAIM 3**

CIVIL RIGHTS Title 18 U.S. Code 241 & 242; Title 42 U.S. Code 1981 & 1983, 1985, 1986

That Plaintiff has filed in several agencies with the Defendants on the deformation and discrimination against Plaintiff by Defendants and their agents to only be ignored, lied to or further with knowledge maliciously acted to further harm and intimidate Plaintiff for being Catholic, white, a women, black balled by the Old Boys Network. That Plaintiff was further discriminated for Standing Up and Speaking out about the Cover Up.

That all defendants and agents of defendants were aware of and had complaints field against Divorce Lawyer Ilona Grenadier Heckman and instead of helping to prevent it they either looked away or empowered it. In doing this the Defendants and the agencies violated the above laws and rules. That the statements, the blogs were hateful speech, threatening the safety and freedom of fear, worship, want and speech of Plaintiff and many others in the United States of America.

### **CLAIM 4**

Fraudulent Concealment illegal by Officers of the Court with the Conversion of Real Property

That since February 14, 1983 Divorce Lawyer Ilona Grenadier Heckman and her "GANG" have with knowledgeable intend with has concealed from Plaintiff with the help of the Defendants by denying any and all discovery in court the documents to further show the collusion and corruption. That properties were converted and sold from Trusts and other ways to deny Plaintiff access to the properties and her rightful ownership by the money she put into the properties, the time and knowledge. Further the collusion of Burke and Herbert Bank was not disclosed until around May of 2016. That Burke and Herbert bank schemed with Ilona from around 1991 to empower her and ruin Plaintiff. That many parties converted Real Property by lying in court, Lying in court documents as Officers of the court.

That the fraudulent concealment is a federal crime that if found guilty includes Jail time. That the concealment of documents is described above and in law suits field in the courts. That in court with discovery will show how deep the above Defendants and their agents have worked to steal from Plaintiff because she is no longer one of them and Catholic. Protected rights of all Americans.

#### **CLAIM 5**

That the Defendants since September of 2007 have acted as an Enterprise in a Scheme to Cover up for the criminal acts and actions of Divorce Lawyer Ilona Grenadier Heckman. They have used the Power of the Defendants agency's to bribe, to steal, to intimidate, to harass, to illegally jail, mail fraud, to cause un-necessary harm to Plaintiff while ignoring the criminal acts by Divorce Lawyer Ilona Grenadier Heckman, David Grenadier, Erika Lewis and others in her "GANG".

That the pattern and practice can be seen by the actions of all the agents of the Defendants. The videos show they are aware of the criminal acts and actions and ignoring them. That they are aware that their actions have caused Death by Suicide of Chris Mackney and the Death of Sally Minetree by the theft of her dogs to line the pockets of friends of the Defendants agents.

That the pattern and practice of the Defendants and the number of "HITS" Murder for hire in Janice's neighborhood and the apparent "HITS" on her life shows the Power of the agents of the Defendants schemes to intimidate.

That the Facts show the actions, blogs, the threatening and criminal "HATE" emails are done by a group of more then 2 or 3 agents of the Defendants in planning each and every Scheme to harm or steal from Plaintiff. Denying Plaintiff the right of freedom of speech, want, worship and Fear.

#### **CLAIM 6**

#### Libel and Slander

. Defendants further knew or should have known that the acts of assaulting, and statements insulting, accusing, and humiliating Janice as described above in front of millions by way of the web of her professional colleagues, clients, and judges would defame and injure her reputation, cause her severe emotional distress, loss of business opportunities, and resulting loss of income, and jeopardize Janice and her girls lives.

In light of said knowledge and other facts alleged herein, each Defendant's actions in each Claim and the action and actions of Janice such as Jailing defamed and injured Janice's reputation for life.

All statements and acts causing such injury to Janice were false, misleading, and unjustified.

As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial. for life. That the acts and actions by Defendants and or their agents were and are knowledgeable with the Intentional Infliction of Emotional Distress.

#### CLAIM 7

### **FALSE IMPRISONMENT**

That this country and the Defendants in their corporation in the Cover of Divorcé Lawyer Ilona used their knowledgably actions have turned back time. Giving me Janice less rights then a slave. Taking someone under Title 42 US Code 1994 and Title 18 US Code 1581(a): Whoever holds or returns any person to a condition of PEONAGE, shall be fined under this title for imprisoned not more than 20 years or both. That on October 22, 2014 I was placed in jail for failure to pay legal fees in 30 days which is a violation of my Thirteenth Amendment "Neither Slavery not involuntary servitude, except as punishment for a crime where of the party shall have duly convicted, shall exist within the United States, or any subject to their Jurisdiction". Furthermore the right by placing me "under" a state Peonage / Involuntary Servitude violating the Fourth Amendment right by malicious prosecution, false imprisonment and unconstitutional arrest. This violation of my Eight Amendment Right as to Excessive Bail which in this case constitutes "Restitution Bail" which further shows the knowledgeable malicious intent to silence me till the election was over on November 4th. 2014. Bias, Retaliation and Retribution to further line the Lawyers pockets by Judge Clark.

That Judge Clark had to release Janice Early after she snuck out documents stating to the other attorneys "I am so sorry I can not collect your legal fees"

## CLAIMS From RICO and RACKETERING SUIT that was DISMISSED without BEING SERVED CLAIMS HAVE NOT CHANGED AGAINST DEFENDANTS

## V. CHARGING ALLEGATIONS: CIVIL RIGHTS COUNT 1

## JANICE ILLEGAL JAILING AND TORTURE 42 U.SC. § 1983, § 1994 18 USC 1581(a) Violating 4th and 8th Amendment

- This Count and each Claim herein assert deprivations of constitutional rights under color of law pursuant to 42 U.SC. § 1983 against Defendants as indicated per Claim.
- Each act alleged in this and each Count of this First Amended Complaint was performed under color of law.
- 3. That all Defendants are aware of Janice's illegal jailing and have acted under the color of law to ignore and to further cover it up to help make Plaintiff homeless and to further the criminal acts with new law suits for ill-gotten legal fees awarded by VA, Judges Wiermer and Clark for favor with Dimuro. and the Old Boys Network.
- 4. That your actions have turned back time. Giving me Janice less rights then a slave. Taking someone under Title 42 US Code 1994 and Title 18 US Code 1581(a): Whoever holds or returns any person to a condition of PEONAGE, shall be fined under this title for imprisoned not more than 20 years or both. That on October 22, 2014 I was placed in jail for failure to pay legal fees in 30 days which is a violation of my Thirteenth Amendment "Neither Slavery not involuntary servitude, except as punishment for a crime where of the party shall have duly convicted, shall exist within the United States, or any subject to their Jurisdiction". Furthermore the right by placing me "under" a state Peonage / Involuntary Servitude violating the Fourth Amendment right by malicious prosecution, false imprisonment and unconstitutional arrest. This violation of my Eight Amendment Right as to Excessive Bail which in this case constitutes "Restitution Bail" which further shows the knowledgeable malicious intent to silence me till the election was over on November 4th. 2014. Bias, Retaliation and Retribution to further line the Lawyers pockets by Judge Clark.
- 5. That Judge Clark had to release Janice Early after she snuck out documents stating to the other attorneys "I am so sorry I can not collect your legal fees"

### Claim 1.1 42 U.S.C. § 1983

- 190. This is a Claim by Janice against Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 191. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 192. That the COA Police by not following up on the harm that was threatened by Michael Stuart by all appearance hired or as favor to Clark, Grenadier, DiMuro, Wieser, Ilona, David et al to harm Janice and her girls
- 193. That the COA / VA sheriffs in warfare torture waking Janice up at night for sleep deprivation, moving Janice around to disorient, the Magistrate threatening the safety of her daughters while she was in jail, the extra patting down when moving about was to intimidate further.
- 194. In performing the acts attributed to them, used, threatened, and attempted to use unreasonable and excessive mental harassment upon Janice despite Janice's lack of physical resistance, in deprivation of Janice's liberty interest to be free from excessive, unreasonable, or unnecessary force under the Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United States ("EXCESSIVE FORCE and HARRASSMENT"). That in Jail documents, papers, and effects against unreasonable search and seizure under the Fourth and Fourteenth Amendments to the Constitution of the United States, ("SEARCH AND SEIZURE").
- 195. . Upon seizing Janice, Defendants at no time advised Janice of any other crime then \$8,100.00 in legal fees for lawyers that had lied in court, lied in court documents of any crime she was accused of committing in deprivation of his right to be

notified of all charges against her secured by the Fifth, Sixth, and Fourteenth Amendments of the Constitution of the United States ("PROCEDURAL DUE PROCES").

- 196, . In so acting, Defendants intended and did deprive, retaliate for, oppress, and chill
- Janice's PUBLIC BENEFIT ACTIVITIES, rights to freedom of speech, expression, privacy, and association, secured by the First, Fifth, and Fourteenth Amendments to the Constitution of the United States and ("EXPRESSION, PRIVACY, and ASSOCIATION");
- 197. In so acting, Defendants did deprive, interfere with, impede, hinder, delay, and oppress Janice's past, ongoing, and future of DUE ADMINISTRATION OF JUSTICE secured by the First, Fifth, and Fourteenth Amendments to the Constitution of the United States ("ACCESS TO JUSTICE");
- 198. In so acting, Defendants were aware of Janice's standing up and speaking out as an advocate for each of the EQUAL PROTECTION CLASSES and acted intending to deprive Janice of her rights as a such in violation to his rights to the equal protection of the laws secured by the Fifth and Fourteenth Amendments to the Constitution of the United States ("EQUAL PROTECTION"):
- 198. In inflicting this Janice's jail time was abusively, violently, and in front of professional in the court at the time of arrest. Defendants injured and assaulted, and intentionally, oppressively, and maliciously humiliated, embarrassed, and defamed Janice as detailed more fully elsewhere, constituting a deprivation of Janice's right not to be subjected to cruel and unusual punishment for being poor and of a conceived lower class by the Defendants under the Fifth, Eighth, and Fourteenth Amendments to the Constitution of the United States ("CRUEL AND/OR UNUSUSAL PUNISHMENT").
- 199. In so acting, Defendants CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing foreseeable injury to Janice in deprivation of Janice's right to not be deprived of life, liberty, or property without due process of law secured by the Fifth and Fourteenth Amendments to the Constitution of the United States ("SUBSTANTIVE DUE PROCESS").
- 200. Defendants performed the acts attributed to them in agreement and coordination with one or more other Defendants as elsewhere detailed.
- 201. As an actual and foreseeable result, Janice has been deprived of state and federal constitutional rights, damaged, and injured in a nature and amount to be proven at trial.

### Claim 1.2 42 U.S.C. § 1983

- 202. This is a Claim by Janice against Defendants deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 202. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 204. . COA Jail has several unknown deputies of the COA Sheriff's Department employed by Defendant COA / VA, working at all times relevant to this Count under the direct and indirect supervision, policies, power, and control of Defendants Clark, COA, VA, and as the agents of each judicial officer acted illegally in the jailing and torture of Janice. That several of the unknown agents of the Sheriffs used indirect supervision, direction, power, and control of Janice for the Defendant's to further harass and permanently damage Janice.
- 205. . On information and belief, supervisors (Lt. Lea and Capt. Williams) with other higher ranking Sheriff's Deputies with the direct ability and power to control, direct, and supervise acts attributed to harm Janice.
- 206. On information and belief, COA Sheriff had the power and ability as deputized peace officers to prevent or aid in preventing each illegal act of their co-Defendants Illegally Jailing Janice. Defendants alleged herein to be a violation of any law, including violation of Plaintiffs' rights, privileges, and immunities under the Constitution of the United States and the Constitution of the State of Virginia.
- 207. In performing the actions in the Jailing of Janice and this Count 1, Defendants are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 208, In performing the actions in the Janice jailing and this Count 1, Defendants subjected or caused to be subjected Janice to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE, DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.

Claim 1.3 42 U.S.C. § 1983 This is against the State of Virginia and the United States of America for the actions of Judge Donald Haddock, Judge Lisa Kemler, Judge Nolan Dawkins, Judge Thomas Fortkort, Judge J. Howe Brown, Judge James J. McGrath, Judge Richard Bowen Potter, Chief Judge Mary Grace O'Biren, Judge Carroll A. Weimer Jr., Judge Richard J. McCue, Judge Donald Kent, Judge James E. Boasberg, Judge Beryl A. Howell, Judge Reggie Walton, Judge Ricard Leon, Judge Gerald Lee, Judge Rudolph Contrerss, Judge Leona Brinkema

- 209. This is a Claim by Janice against VA and USA for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 210. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 211. The above Judges were at relevant times a Judge of the USDC District of Columbia, USDC Eastern Division of Virginia or Circuit Court Judges in the State of Virginia an employee of Defendant's USA or VA a coordinator in the Janice Jailing. and an agent of USA or VA.
- 212. On information and belief, in performing the acts attributed to them in the Janice jailing, the above Judges acted as a supervisor, director, and principal of Defendants USA or VA. Each Janice jailing COORDINATOR, in their activities elsewhere described.
- 213. On information and belief, Defendant's collaborated with USA and or VA COURT, to plain and participate in the Janice jailing. ("PLANNING AND DELIVERY"), with extra notices to confirm Janice would be in court.
- 214. In performing the actions in the Janice Jailing and the USA and VA are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 215. In committing the actions as alleged in the Janice Jailing the USA and VA, in collaboration and agreement with each other including lawyers Wieser, DiMuro, Grenadier Janice Jailing COORDINATOR's, subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 216 . As an actual and foreseeable result, PLAINITFF has been deprived, damaged, and injured as elsewhere alleged for life.

### 42 U.S.C. § 1983

#### 42 U.S.C. 8 1983

## Against VA - Judges McGrath, Fortkort, Brown McGrath, Dawkins, Kemler and Haddock

- 217. This is a Claim by Janice Jailing against Defendants VA Judge McGrath, Fortkort, Brown, McGrath, Dawkins, Kemler and Haddock for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 218. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 219. Defendants at all times relevant to this Count and Claim was, are or were a Judge of the state of Virginia and worked in collusion to coordinate between September of 2007 and January of 2012 to prevent Due Process and coordinated in Ex-parte communications to protect one of there own Divorce Lawyer Ilona Grenadier Heckman.
- 220. On information and belief, Defendants McGrath, Fortkort, Brown, McGrath, Dawkins, Kemler and Haddock were a collaborator with DiMuro, Wieser and Grenadier, Ilona and possibly other Janice Jail COORDINATORS in the PLANNING AND DELIVERY.
- 221. The above in there Bias Orders, allowing Lawyers to Lie in court, Lie in Court documents in performing the actions in the Jailing of Janice and this Count 1, They are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 222. In performing the actions described in this Count 1 with each other Defendants as alleged, subjected Janice or caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT. When the Judges and Lawyers Self Policing did not in any way stop or correct their errors they committed Fraud on the court. Violating That all "ORDERS ARE VOID" Due to the Judges lack of Jurisdiction. VA Code 17.105 (b) and VA Code § 8.01-428. Setting aside default judgments; clerical mistakes; independent actions to relieve party from judgment or proceedings; grounds and time limitations.
- A. Default judgments and decrees pro confesso; summary procedure. Upon motion of the plaintiff or judgment debtor and after reasonable notice to the opposite party, his attorney of record or other agent, the court may set aside a

judgment by default or a decree pro confesso upon the following grounds: (1) fraud on the court, (ii) a void judgment, (iii) on proof of an accord and satisfaction, or (iv) on proof that the defendant was, at the time of service of process or entry of judgment, a person in the military service of the United States for purposes of 50 U.S.C. app. § 502. Such motion on the ground of fraud on the court shall be made within two years from the date of the judgment or decr

223. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

### Claim 1.5

### 42 U.S.C. § 1983

## Against Defendants USA Judges Boasberg, Howell, Walton, Leon, Lee and Contreras, Ginsburg, Rogers, Srinivasan and Brinkema, Doe

- 224. This is a Claim by Janice against Defendant USA. For deprivation of rights under color of law pursuant to 42 U.S.C. § 1983
- 227. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 228. USA Judges at all times relevant to this Count had the ability to stop the Jailing of Janice if they had followed the law and allowed her equal access to the courts.
- 229. On information and belief, Janice was denied equal access due to being poor and the personal relationships the above Judges had with other Defendants working and religious. These Judges collaborator the other Defendants to coordinate the Jailing of Janice.
- 230. On information and belief, these Judges met with one or more other Defendants to
- COORDINATOR the cover up of the criminal acts and actions of the other Defendants and especially Divorce Lawyer Ilona Ely Grenadier Heckman who hates Catholics.
- 231. On information and belief, Defendants communicated with others who COORDINATED THE Jailing of Janice.
- 234. In performing the actions in the Orders or lack of Orders allowing Due Process and this Count 1, the above Judges are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.
- 235. In performing the actions described in this Count 1 with each other Defendants caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 236. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

  Claim 1.6

### 42 U.S.C. § 1983

## Against Defendants GRENADIER LAW, WIESER, REED, RICH, BWW, TROUTMAN, PARKER, KELLER, VSB, DIMURO and Ilona, Gurvitch

- 237. This is a Claim by Janice against the above Defendants AND ASSOCIATES for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983.
- 238. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 239. Above defendant at all times relevant to this Count 1 was a practicing attorney and notorious member of the "Old Boys Network" in Virginia.in conjunction with the USA and VA COURT's, employee, owner, and agent of Defendants different law firms were a ware of and help to coordinate the Cover up of Ilona and Grenadier Law.
- 240. On information and belief, the above met with one or more Janice Jailing COORDINATORS.
- 241. On information and belief, the above communicated with other Janice Jailing COORDINATORS., Discussing Plaintiffs' PUBLIC BENEFIT ACTIVITIES, DUE ADMINISTRATION OF JUSTICE, and her participation in exposing the Corruption in the Judiciary, the Government and Elected Officials. The members of the Old Boys Network have commented to the effect of "that's why we have to do what we do." Meaning Jailing Janice to Silence her or through warfare torture have her commit Suicide. The Old Boys Network cannot afford more Murder for Hire.
- 248. In performing the actions in the Janice Jailing and this Count 1, the above Lawyers and associates of the firms are CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.

249. In performing the actions described in this Count 1 with each other Defendants as alleged, the above subjected Janice or caused Janice to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.

250. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

### Claim 1.7 Retaliation

### 42 U.S.C. § 1983 Against all Defendants

- 251. This is a Claim by Janice against all Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 by efforts to retaliate against Plaintiffs for telling the "TRUTH" supposedly your best defense. COMPLAINT I and the DUE ADMINISTRATION OF JUSTICE in the Janice Jailing
- 252. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 254. On information and belief, upon a meeting with Judge Giammittorio it is believed the Scheme to deny due process and to allow the "TURTH" of the criminal acts of Ilona, Erika and David and all other Defendants was going to be denied in any type of Open Court room.
- 260. In performing the actions described in this Count 1 with each other Defendants as alleged, subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 261. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

  Claim 1.8

### Retaliation

### 42 U.S.C. § 1983 By Judge Donald Kent and his x-wife Martha Kent

- 262. This is a Claim by Janice against Defendants VA, VSB for deprivation of rights under color of law pursuant to 42 U.S.C.  $\S$  1983
- 263. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 264. On information and belief, February of 2011 after many phone calls starting on around November 3, 2008 with assistant to Patsy Ticer a meeting is had —even though I live walking distance in Alexandria to have meeting I had to go down to Richmond which she was still toood busy to meet with me and set me up with an older women who claimed ot be her assistant —I would find out later that was a "LIE" Instead: set me up with Martha Kent x-wife of Judge Kent. I will not be spineless like Martha Kent and Patsy Ticer and allow a bunch of overgrown "BULLIES" to control me as they have them. After listening to my story she said to me:
  - "Do you know who I am?" no
  - "I am the x wife of Judge Donald Kent" Martha Kent
  - "I have walked in your shoes you can't win this"
  - "Me and My family can't get a fair trial either"
  - "You are no longer one of them"

Defendants VA, COA and VSB have ignored this and all other allegations determined to retaliate against Janice for her involvement with exposing the TRUTH.

272. In performing the actions described in this Count 1 with each other Defendants as alleged, Defendants subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.

273. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.9 42 U.S.C. § 1983 Against Defendant USA, VA, COA 274. This is Claim by Janice against Senator Mark Warner and Patsy Ticer for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for planning, supervising and implementing the Janice Jailing and acts of others in violation of PLAINTIFS' rights, privileges and immunities.

275. Senator Mark Warner "elected by the residents of the State of Virginia. By all news reports and reporting of his own self that he offered a Judgeship to the daughter October 11, 2014 – Breaking news Senator Mark Warner and aid to Governor Terry McAuliffe guilty and admit to offering a Federal Judgeship to daughter of Phil Puckett on or around October 14, 2014 – Janice exposes on Blog Valaw2010.blogspot.com information of corruption by Senator Warner.

276. On or around October 22, 2014 – November 12, 2014 – 22 days Janice illegally jailed and tortured in the City of Alexandria, Solitaire Confinement till 5pm on Election day Tuesday, November 4, 2014. Illegally Jailed to: 1. Silence her and stop exposure of e-mails between herself and Mark Warner's office on the corruption in the Judiciary. Janice went to Mark Warner for help instead he had her jailed, at the same time it was exposed his "Pay to Play" with a Federal Judgeship for a favor. Being ignored by the Senate Ethics Committee. Janice out of retaliation was held in Solitaire Confinement till 5 pm on Election day by Defendants. 2. To Bully / scare her into either committing Suicide or to turning the other check of the corruption and not holding Virginia and the Federal Judiciary, the Government and Elected Officials accountable, as well as the criminal acts and actions of the Old Boys Network in Virginia The State of Virginia is sued for his individual and official capacities.

278. On information and belief, Senator Mark Warner in a close race was aware of such speech and political activities, and acted at all times herein with the intent to retaliate, deprive, interfere with, and oppress such activities in deprivation of Janice and Janice's rights to SPEECH, ASSOCIATION, and PRIVACY; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS.

281. On information and belief, at all times mentioned in this Complaint VA has been aware of his co-defendants' acts relating to Janice and the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' PUBLIC BENEFIT ACTIVITIES.
283. In performing these actions, VA is CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, causing reasonably foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS.

284. In performing the actions described in this Count 1 with each other Defendants as alleged, VA / Senator Mark Warner subjected Janice or caused her to be subjected to deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; PROCEDURAL DUE PROCESS; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; CRUEL AND/OR UNUSUSAL PUNISHMENT.

285. As an actual and foreseeable result, PLAINITFFS have been deprived, damaged, and injured as elsewhere alleged.

Claim 1.10 42 U.S.C. § 1983 Chilling

300. This a Claim by Janice against Defendants, its associates, members and affiliates, and Janice, for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for planning and participating in the illegal Jailing of Janice in violation of PLAINTIFS' rights, privileges and immunities, causing "chill" of existing and further protected activity.

301. All prior paragraphs are re-alleged and incorporated as if set forth in full.

302. Defendants were aware of the Criminal Acts of Divorce Lawyer Ilona Grenadier Heckman

303. Defendants disfavored Janice from PUBLIC BENEFIT ACTIVITIES; Plaintiffs' "JUDGES BEHAVING BADLY" MESSAGE, the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' ongoing...

304. Defendants' organized and committed the Jailing of Janice to deprive, intimidate, thwart, retaliate for, and chill the same ("CHILL").

305. Plaintiffs and others at or aware of the Janice Jailing were CHILLED; frightened, intimidated, demoralized, thwarted, and emotionally traumatized by Defendants' activities.

306. As an actual and foreseeable result, Janice, and affiliates have since been deterred, intimidated, deprived, or abandoned further PUBLIC BENEFIT ACTIVITY, and DUE ADMINISTRAITON OF JUSTICE, dissembled, disassociated, avoided interactions with one another.

307. Janice's clients, professional colleagues, and affiliates at or aware of the Janice Jailing who previously had high opinions of Janice and provided or referred PLAINTIFS significant business opportunities, stopped associating with, providing or referring such opportunities out of fear of reprisal by Defendants.

308. In performing the actions described in this Count and the Janice Assault, Jailing

the COORDINATORS and each of them, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, have subjected Janice her affiliates, or caused them to deprivation of their rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; and ACCESS TO JUSTICE.

309. As an actual and foreseeable result of the acts of each Defendant to this Count 1, Janice affiliates, have been deprived, damaged, and injured in their persons and property in a manner and amount to be proven at trial.

### COUNT 2 Virginia State Law Claims

This is a Count against Defendants consisting of supplemental Claims under Virginia state law and a single Claim under 42 U.S.C. § 1983 based thereon.

#### Claim 2.1

### Breach of Contract, Covenant of Good Faith and Fair Dealing

- 314. This is a Claim by Janice for breach of contract and covenant of good faith and fair dealing under Virginia state law and 42 U.S.C. § 1983
- 315. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 316. In committing the Janice Jailing Defendant UNREASONABLY and CULPABLY deprived Janice of her rights under the CONTRACT without cause, notice, justification, or abatement, thereby breaching the contract.
- 317. Based on Defendant COA, VA participation in the Janice Jailing ENTERPRISES, and other CULPABLE acts alleged herein, its acts in breach of contract were in bad faith, malicious, fraudulent, and oppressive, in breach of the covenant of good faith and fair dealing.
- 318. As an actual and foreseeable result, Janice has been damaged or injured in a nature and amount to be proven at trial.

### Claim 2.2

### Wrongful Inducement to Breach Contract, Covenant of Good Faith and Fair Dealing Against Janice Jailing COORDINATOR Defendants

- 319. This is a Claim by Janice for wrongful inducement to breach contract, breach of covenant of good faith and fair dealing, wrongful interference with prospective contractual relations, and defamation against all Janice COORDINATOR Defendants under Virginia State law and 42 U.S.C. § 1983
- 320. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 321. Defendants and each of them were aware of the rights to Real Property stolen by Divorce Lawyer Ilona Grenadier under VA CONTRACT law and the covenant of good faith and fair dealing attendant thereto, prior to the Janice Jailing and ASSAULT, and by their UNREASONABLE and CULPABLE actions in breach of one or more PROFESSIONAL DUTIES expected and intended their actions to cause the breach thereof.
- 322. As an actual and foreseeable result, USA, VA and COA did UNREASONABLY and CULPABLY breach the Janice CONTRACT and covenant of good faith and fair dealing attendant thereto, causing Janice damages and injuries in a nature and amount to be proven at trial.

#### Claim 2.4

## Interference with Economic Relations Against Janice Jailing COORDINATOR Defendants

- 323. This is a Claim by Janice for wrongful interference with existing and prospective economic relations, and defamation against Janice. 42 U.S.C. § 1983
- 324. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 325. Janice Jailers and COORDINATOR Defendants knew or should have known of Plaintiffs' PUBLIC BENEFIT ACTIVITIES and Janice's profession and POSITION UNDER THE UNITED STATES, and the existing and potential economic relations as an Entrepreneur.
- 325. Janice's ASSAULT COORDINATOR Defendants knew or should have known that committing each act's as the blog jwgrenadierisalair.blogspot.com in the Janice's ASSAULT would wrongfully interfere with such relations. That in December

- of 2015 a new blog which is still on the web along with continuing e-mails making the harassment the slander and libel a continuing occurrence by Ilona Grenadier Heckman and her gang the blog is janicewolkgrenadierinjail.blogspot.com That Janice viewed it as recently as November 11, 2015 where Ilona and her gang is calling Janice a Terrorist.
- 326. Defendants knew or should have known that causing or contributing to the Janice Jailing would damage Janice, and cause resulting business income loss for My Pillow Pack.
- 327. In performing the acts ascribed to them in the Janice Jailing and Count 1, Defendants to this Count 2 actually and proximately caused Janice to suffer lost business opportunities, revenue, and goodwill in a nature and amount to be proven at trial.
- 328. Defendants knew or should have known that causing or contributing to the Janice Jailing would damage Janice, and cause resulting injury and loss to Janice and her business ventures. Which defendants where aware of with the help of the Ilona Gang and the Blogs calling Janice a Homosexual and Aniti Christ forging e-mails et al were criminal libel and discriminatory towards Janice.
- 329. In performing the acts as described to them in the Janice Jail and Count1, Defendants to this Count 2 actually and proximately caused PLAINITFFS to suffer lost business opportunities, revenue, and goodwill in a nature and amount to be proven at trial.
- 330. As an actual and foreseeable result, Plaintiffs have been deprived, damaged and injured in a nature and amount to be proven at trial.

## Claim 2.5 Defamation, Libel and Slander

- 331. This is Claim by Janice against all DEFENDANTS by virtue of the defamatory and extreme and outrageous nature of their conduct, causing severe mental distress and constitutional deprivation thereby.
- 332. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 333. In performing the acts ascribed to them in the Janice Jailing and each Claim of Counts 1 and 2, Defendants, and each of them, knew or should have known that Janice was an entrepreneur maintaining of business, personal, and professional relationships in the City of Alexandria since April of 1983...
- 334. Defendants further knew or should have known that the acts of assaulting, and statements insulting, accusing, and humiliating Janice as described above in front of millions by way of the web of her professional colleagues, clients, and judges would defame and injure her reputation, cause her severe emotional distress, loss of business opportunities, and resulting loss of income, and jeopardize Janice and her girls lives.
- 335. In light of said knowledge and other facts alleged herein, each Defendant's actions in each Claim of Count 1 and the Janice Jailing defamed and injured Janice's reputation for life.
- 336. All statements and acts causing such injury to Janice were false, misleading, and unjustified.
- 337. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

### Claim 2.6

### Intentional Infliction of Emotional Distress

- 338. This is Count by Janice against all DEFENDANT's for injury by virtue of the defamatory and extreme and outrageous nature of their conduct, causing severe mental distress and constitutional deprivation thereby.
- 339. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 340. In performing each acts ascribed to them in the Janice's Jialing the Blogs, the Threats on her life and her girls life's and well being and each Claim of Count 1, each Defendant intended to cause, or acted in reckless disregard of the likelihood of causing and did cause Janice extreme emotional distress.
- 341. As an actual and foreseeable result of the Janice Jailing the Gang like harassment by Judges, Lawyers, the City of Alexandria, and the State of Virginia as well as Federal Judiciary and each Defendant's actions in each Claim of Count 1, Janice has in fact suffered severe emotional distress and resulting loss to business opportunities and income.

### Claim 2.7

### 42 U.S.C. § 1983

## Inducement to Breach Contract, Covenant of Good Faith and Fair Dealing

342. This is a Claim by Janice against Defendants / COORDINATOR's for deprivation of SUBSTATNIVE DUE PROCESS by virtue of each prior Claim in this Count pursuant to 42 U.S.C. § 1983

- 343. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 344. Defendants and each of them were aware of Plaintiffs and their affiliates, PLAITNIFFFS' PUBLIC BENEFFIT ACTIVIES and the Patent pending for My Pillow Pack..
- 345. Defendants, and each of them, CULPABLY planned, coordinated, communicated, and cooperated with each other to induce and affect the Janice Jailing and torture ASSAULT knowing and intending the same to be a breach of the CONTRACT and covenants thereto.
- 346. In committing each act alleged in each Claim of this Count, each Defendant intended and expected to further the purposes of each ENTERPRISE which the Defendant is affiliated with, including all "racketeering activity" of those ENTERPRISES as that term is defined in 18 U.S.C. § 1961(1). As such, each act alleged in each Claim herein constitutes an act "involving" the predicate crimes of kidnapping, robbery, bribery, and extortion alleged in Racketeering Counts.

  347. In committing each act as described in this Count, Janice Jailing COORDINATOR Defendants deprived PLAINITFF of rights relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 348. As an actual and foreseeable result of the Janice Jailing / Blogs / Threats on her life and each Defendant's actions in each Claim of Count 1, Janice has in fact suffered severe emotional distress and resulting loss to business opportunities and income.

### COUNT 3

### Malicious Prosecution, Obstruction of Justice 42 U.S.C. § 1983

- 349. This is a Count by Janice against all Defendants, including and not limited to other John and Jane Doe 's not listed as Defendants in the Janice Jailing ASSAULT COORDINATORS for deprivation of
- rights under color of law pursuant to 42 U.S.C. § 1983. This Count sets forth a series of related crimes of abuse of color of law authority and legal process to impose duress, undue influence, retaliation, and oppression on Plaintiff and her girls. These acts include obstruction of justice, malicious prosecution, perjury, prosecutorial misconduct, kidnapping, and extortion under state and federal law, and form the factual basis of PLAITNIFFS' Claims to several Racketeering Counts, and tolling by duress, fraud, and undue influence.
- 350. The General Allegations to this Count identify both immune and non-immune acts. The Claims of this Count are based only on the non-immune acts. Other acts are relevant to legal issues not relevant to the claims of this Count such as racketeering activity, fraud, duress and undue influence, to which immunity is not a defense.
- 351. For all actions relevant to this Count, all Defendants and each of them, acted under color of law to interfere with, deter, deprive, and retaliate for Plaintiffs' exercise of rights, privileges, and immunities under the Constitution of the United States and the Constitution of the State of Virginia.
- 352. In performing each act attributed to them in this Count, CITY ATTORNEY DEFENDANTS COA were bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL (non-discretionary), and REASONABLE CARE.

## GENERAL ALLEGATIONS TO COUNT 3 The COA, VA and USA Claim and Demand

- 353. Shortly after a meeting with the COA Mayor, COA Police, and the COA attorney Janice, e-mailed and mailed a letter to the Attorney General, the Governor of Virginia and e-mailed the remainder a Demand letter as requested. Such letter has been ignored. Demanding compensation for the injuries Janice suffered in the Cover up of the Criminal Acts of Divorce Lawyer Ilona Grenadier Heckman the Defendants and at the hands of the Sheriffs in jail. (the "CLAIM AND DEMAND").
- 354. The CLAIM AND DEMAND outlined facts consistent with those set forth in this Complaint..
- 355. Janice received either no answer or an answer they felt they had no liability to Janice.
- 357. Defendants' records will reflect that e-mail or ignoring gives the appearance of summarily denied liability for the Janice's Jailing et al with no specific explanation. That no defense was given as to legally right to do to Janice what has been done.
- 368. Recognizing the scope of the dispute, the number of questionable Suicides that surround the Old Boys Network, along with MURDER FOR HIRE Janice is afraid for her and her girl's lives. That the Defendants are and have became intimidated and frightened Janice by there actions, and statements. Considered to be a very real threat to his personal security.
- 371. On information and belief, by Police, Judges and other lawyers also aware of Plaintiffs' PUBLIC
- BENEFIT ACTIVITIES and DUE ADMINISTRATION OF JUSTICE, including the Jailing COORDINATOR Defendants' hostility to such activity Defendants and their representatives therefore acted in conspiracy and ENTERPRISE to protect

Defendants own interests, the interests of its insured's and their affiliates to oppress and impede the CLAIM AND DEMAND, and impose further HARASSMENT and ABUSE of Plaintiff.

372. In doing so, USA, VA and COA imposed duress, intimidation, fear, and oppression which did in fact cause Janice to cease pursuing the CLAIM AND DEMAND, the DUE ADMINISTRATION OF JUSTICE, and initiation of this Action.

## Prosecutorial Misconduct of Assistant City Attorney City of Alexandria Megan Roberts, George McAndrews, James L. Banks Jr, Corine Parks Paralegal, Ms. Gerry and Ms Christia Brown, Commonwealth Attorney's office

373. On about October 10, 2014, on information and belief, The City Attorneys and the Commonwealth Attorney interfered in Police Report on the corruption in the COA Courts.

374. That prior to this the City of Alexandria Attorneys to harass Janice filed suit over gutters and an RV in her drive way legally parked. That the use of COA employees to intimidate and to harass Janice has been an on going criminal act.
375. Janice has now endured years in persecution as a result of such outrageous behavior. Janice appears today to redress those acts for herself and, she prays, thousands of others who have suffered similar and even more outrageous insults, violations, deprivations, and injuries under the indecency of those who today occupy offices of honor, yet who regularly debase those offices while driven by motives no one, perhaps not even they themselves, could honor.

376. Such behavior was intended to retaliate, obstruct, and deprive Janice of rights, privileges and immunities under state and federal Constitutions. Janice subsequent arrest, imprisonment, injury, and severe mental distress constitute numerous serious felonies under state and federal law, as detailed through out this Complaint.

377. COA Police, the FBI and others acts in investigating, manipulating evidence, witnesses, and the Virginia and Federal Judiciary / Courts and initiating the prosecution of Janice for exposing the criminal acts of the Judiciary, the Government and Elected Official matter constitute CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, and have foreseeably resulted in deprivations of Janice's clearly-established rights under the First Amendment to the Constitution of the United States. Such acts are not immune from criminal accountability, and those on which the Claims of this Count are based, are not immune from civil.

- 378. These acts of the Defendants will be referred to as Defendants PERJURY ONE.
- 379. That Janice will be able to show that all Lawyers in this suit have lied in Court, lied in Court documents to Cover up Criminal Acts of Divorce Lawyer Ilona Grenadier or the other Defendants.
- 379 That PERJURY TWO was to interfere with and retaliate for Plaintiffs' PUBLIC BENEFIT ACTIVITIES and the DUE ADMINISTRATION OF JUSTICE.
- 382. On information and belief, Defendants did so with the knowledge and support of , all of whom acted with the specific intent to retaliate against Janice for telling the "TRUTH" and exposing the continuing criminal acts and actions of the Defendants. DEFENDANT'S caused Janice to be imprisoned without probable cause causing a false imprisonment for 22 days. At the time Janice was imprisoned by Defendants the Judges and others knew or should have known of the perjuries and retaliatory nature of the Old Boys Network. (FALSE IMPRISONMENT 1).

  385. Janice was jailed for being poor was the appearance but, it went much deeper which will be proven at trial.

#### Judicial Misconduct

387. On October 22, 2014 Judge James Clark bias to protecting his friends. Having been asked several times to recuse himself refused. That even today as this is being written the Defendants have filed a new suit with a new Scheme to further forever harm Janice.

388. That the Judiciary in the Federal Government and the State of Virginia is a disaster. That in the past it has been mostly Blacks that they have had to deal with and could intimidate and be Disingenuous as no one was going to stand up for them. That in Virginia the Old Boys Network has intimidated and make it clear to lawyers that they will loose there license if they don't do as told. This is changing the new face of who the Federal Government, Virginia and these defendants are dealing with are white people. Who for there whole lives believed in a Freedoms we were taught we had. The Defendants have violated that trust and that freedom of Janice.

400. That the Defendant lawyers believe they can file anything they want and the Judge's to protect them and the Criminal acts of all involved will rule as the Lawyers who put them in position of being a Judge owe.

401. Such acts, though possibly immune from civil suit, constitute "monstrous" felony criminal violations of Janice's rights relating to SEARCH AND SEIZURE, PROCEDURAL and SUBSTANTIVE DUE PROCESS, and CRUEL AND/OR UNUSUAL PUNISHMENT.

414. On information and belief, Defendants collaborated, agreed, affiliated, and conspired, City Attorney and Defendants on Janice's Jailing ASSAULT COORDINATORS, and other ENTERPRISE PERSONS, including other Judges that are party to the Old Boys Network in Virginia.

445. 18 U.S.C. § 242 provides: Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both.

446. The Criminal Activities to Cover up the Truth the numerous acts of punishment and prosecution of protected speech along with the perjury and subornation of perjury constitute deprivations of Janice's rights secured under the First, Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution and related provisions of the Constitution of the State of Virginia. Whether shielded from civil accountability or otherwise, the felonies represent a deplorable pattern of contempt of law. They are also RICO predicate crimes under 18 U.S.C. § 1961(1)(A) and (B), as detailed below.

447. On information and belief, defendants sought to impose these deprivations knowing such to be criminal violations of Janice's constitutional rights in order to punish, retaliate, obstruct justice, and CHILL Janice from further criticism of the Judiciary, the Government and Elected Officials and all other Defendants herein, and to intimidate, harass, and oppress Janice from pursuing the CLAIM AND DEMAND, this Action, the DUE ADMINISTRATION OF JUSTICE, and PUBLIC BENEFIT ACTIVITIES.

448. That Judge Clark for the Love that Judge Haddock et al has for Ilona used jail as a conduit and device to impose fear, retaliation, intimidation, duress, undue influence to try and impede Janice bringing this Action, and further deprive her of rights privileges and immunities secured under

the Constitutions of the United States and the State of Virginia.

452. Janice is and was and in fact remains intimidated, oppressed, fearful, and under duress from all defendants illegal activity.

453. Janice was imprisoned by Judge Clark for the other favor of the other defendant, who knew or should have known of the malicious and retaliatory nature of the prosecution until release on November 12, 2014. Such constitutes a false imprisonment for 22 full days (FALSE IMPRISONMENT).

454 Janice was imprisoned on October 22, 2014 with only DiMuro lawyers stating she had a home with a value of \$700,000. Which they were aware no equity existed possibly and the home was in foreclosure.

456. That due to the Gang like activity the Blogs they the Defendants had killed any hopes of Janice getting a job. That the malicious behavior by the Judiciary et al is to cover up the criminal acts and actions of themselves and there friends, the other defendants.

466. As an intended or a reasonably foreseeable result of these actions of Defendants, Janice has been reasonably fearful, intimidated, frightened, deceived, and thereby under duress and undue influence to exercise his rights to bring this Action sufficient to equitably extend or toll the running of any statute of limitations on all Claims. *Ateeq v. Najor*, 15 Cal. App. 4th 1351, 1356, 19 Cal. Rptr. 2d 320, 323 (1993); *Lauter v. Anoufrieva*, 642 F. Supp. 2d 1060, 1101 (C.D. Cal. 2009). 467. The events in this Section shall collectively be referred to as the MALICIOUS PROSECUTION. The DEFENDANTS' role in them shall be referred to as the PROSECUTORIAL MISCONDUCT.

### Claim 3.1 42 U.S.C. § 1983

468. This is a Claim by Janice against Defendants and it's unknown Claims representative, for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for its response to the CLAIM AND DEMAND, and its role in the CITY ATTORNEY DEFENDANTS' and Janice's COORDINATORS' response to the CLAIM AND DEMAND, foreseeably leading to the MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and FALSE IMPRISONMENTS. 469. All prior paragraphs are re-alleged and incorporated as if set forth in full.

470. At all times herein mentioned, VA Judges and Federal Judges, Commonwealth Attorney was acting as an agent or employee of USA, VA or COA and on information and belief each Janice ASSAULT COORDINATOR in all acts relating to the CLAIM AND DEMAND. In such capacity, VA, COA acted

under color of law.

471. On information and belief, in responding to the CLAIM AND DEMAND, VA, COA collaborated with Janice's ASSAULT COORDINATORS and CITY ATTORNEY DEFENDANTS in the MALICIOUS PROSECUTION, and FALSE IMPRISONMENTS by providing or generating false or misleading information, testimony, documents and other evidence to other Defendants, precipitating acts in the

MALICIOUS PROSECUTION, and foreseeably causing the FALSE IMPRISONMENTS and other subsequent events.

472. In committing the acts as described in this Count 2, VA, COA and Defendants UNREASONABLY breached one or more PROFESSIONAL DUTIES, including the duty of good faith and fair dealing available to Claimant beneficiaries of property and liability insurance policies written in Virginia, causing foreseeable constitutional deprivation to Janice in violation of Janice's rights to SUBSTANTIVE DUE PROCESS, and extreme mental distress.

473. In performing the actions in this Count 2, Defendants subjected Janice or caused her to be subjected to the PROSECUTORIAL MISCONDUCT, FALSE IMPRISONMENTS, and MALICIOUS PROSECUTION, constituting a deprivation of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.

474. As an actual and foreseeable result, Janice has been deprived, damage, and injured in a nature and amount to be proven at trial.

### Claim 3.5 42 U.S.C. § 1983 Chilling

498. This a Claim by Janice against all DEFENDANTS for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for all nonimmune acts of the MALICOUS PROSEUCITON, PROSECUTORIAL MISCONDUCT, and CLAIM AND DEMAND, in violation of PLAINTIFS' rights, privileges and immunities.

499. All prior paragraphs are re-alleged and incorporated as if set forth in full.

500. Each Defendant to this Claim was aware of the Criminal acts of Divorce Lawyer Ilona Grenadier Heckman and had an obligation to speak up. That Janice's PUBLIC BENEFIT ACTIVITIES, and ENGAGEMENT before each event in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT.

501. Defendants disfavored these Plaintiffs' PUBLIC BENEFIT ACTIVITIES; Plaintiffs' "JUDGES BEHAVING BADLY" MESSAGE, the DUE ADMINISTRATION OF JUSTICE, and Plaintiffs' ongoing.

502. Defendants' organized, committed, and participated in the Janice Jailing ASSAULT, MALICIOUS PROSECUTION, and response to the CLAIM AND DEMAND to deprive, intimidate, thwart, and retaliate for the same.

503. Plaintiff and others at or aware of the MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT were frightened, intimidated, demoralized, and emotionally traumatized by Defendants' activities.

504. By the MALICIOUS PROSECUTION, and PROSECUTORIAL MISCONDUCT, Defendants CHILLED Plaintiffs and their affiliates from further PUBLIC BENEFIT ACTIVITIES and other rights of SPEECH, ASSOCIATION, ACCESS TO JUSTICE, and SUBSTANTIVE DUE PROCESS.

505. As an actual and foreseeable result, Janice and affiliates have since been deterred, intimidated, deprived, or abandoned further PUBLIC BENEFIT ACTIVITY, DUE ADMINISTRATION OF JUSTICE, dissembled, disassociated, and avoided interactions with one another, causing Plaintiffs lost business opportunities and revenue.

507. In performing the actions described in this Count and the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT, the Janice ASSAULT COORDINATORS and each of them, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, have subjected Janice and affiliates, or caused them to be subjected to deprivation of their rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; and ACCESS TO JUSTICE.

508. As an actual and foreseeable result of the acts of each Defendant to this Claim, Janice and affiliates, have been CHILLED, deprived, damaged, and injured in their persons and property in a manner and amount to be proven at trial.

COUNT 4
Obstruction of Justice
42 U.S.C. § 1983

- 509. This is a Count against Defendants for obstruction of justice relating to events subsequent to the filing of this Action, constituting deprivations of rights under 42 U.S.C. § 1983
- 510. That since on or around March of 1990 Janice can and will show with documents the Obstruction of Justice by lawyers Defendants that through each law firm has a representative that has lied in court, lied in court documents, lied in documents to the Supreme Court of Virginia.
- 511. That the Judge's have been in all case chosen by Favoritism and Cronyism ie friend's of Defendant Ilona, Erika or David to rule in there favor ignoring the law in hopes that Plaintiff will commit suicide or one of their threats on her life will happen.
  512. That Judge Haddock made it clear all Judges' would be chosen by him to protect Ilona from the Truth being exposed for the "LOVE" he has for her.
- 541. By virtue of the actions of Defendants, and each of them, detailed in the different Orders or documents that they were not going to allow the Truth to be exposed of the corruption in the Judiciary, the Government and with the Elected Officials. Defendants have deprived or caused deprivation to Janice of rights
- to SPEECH, PRIVACY, and ASSOCIATION; SEARCH AND SEIZURE; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS, causing deprivation, damage, and injury in a nature and amount to be determined at trial.

# COUNT 5 Obstruction of Justice, Deprivation of Rights Under Color of Law 42 U.S.C. § 1983

- 551. This is a Count against Defendants, for their *ultra vires* acts under color of law constituting deprivations of rights privileges and immunities under 42 U.S.C. § 1983. Defendants' acts and failures include creating and maintaining illegal policies, rules, and customs, causing and permitting a culture of deliberate indifference, failure to train, breach of PROFESSIONAL DUTIES, and failure to act in a special relationship, foreseeably causing constitutional deprivation as elsewhere alleged.
- 552. Defendant VA Commission on Judicial Performance, at times authorized to perform certain activities under the Commission, except in such times as he was acting *ultra vires*, beyond the scope of authority in his office, in CULPABLE and UNREASONABLE breach of one or more PROFESSIONAL DUTIES, in criminal and civil conspiracy, or in violation of Plaintiffs' rights under the Constitution of the State of Virginia.
- 554. The VSB In performing all acts attributed to them in this Count, have ignored the criminal acts of the lawyers by all appearance for the funding they receive from them. The VSB were bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL (non-discretionary), SUPERVISORIAL, FIDUCIARY, SPECIAL RELATIONSHIP, CREATION OF DANGER, SOCIAL WORKER and REASONABLE CARE. Said duties include duties to assure others within their power and control abide by their duties.
- 555. The VSB, FBI, DOJ and the JIRC authorized activities include investigating Plaintiff Janice's complaints to the Commission on Judicial Performance were ignored and she was told to not send any other complaints as they would be returned as these were.
- 557. VA, USA and COA functioned at all times under color of law and only in an administrative capacity. At no relevant time has either functioned to protect Janice..

### Claim 5.1 Illegal Line-Drawing 42 U.S.C. § 1983

558. This is a Claim for deprivation of rights under color of law for USA, VA and VSB unauthorized rulemaking to permit illegal judicial conduct, causing foreseeable constitutional injury to Plaintiffs as elsewhere alleged.
559. All prior paragraphs are re-alleged and incorporated as if set forth in full.

### Judge's "Line Drawing" Duties

560. USA, VA and VSB duties and responsibilities include "oversight, supervision, training, supervision, and discipline over judges of Virginia and Federal courts and the justices of the Court of Appeal and Supreme Court." Their duties and responsibilities also include the power and duty to discipline, control, or influence "former judges for conduct prior to retirement or resignation." They also "share authority with the superior courts for the oversight of court commissioners and referees."

- 561. That the USA, VA and COA "authority is limited to investigating allegations of judicial misconduct and, if warranted, imposing discipline." "Judicial misconduct usually involves conduct in conflict with the standards set forth in the Code of Judicial Ethics. After investigation and in some cases a public hearing, the commission may impose sanctions ranging from confidential discipline to removal from office."
- 562. Under such authority, the FBI, the Commonwealth Attorneys, the OAG have a role in creation, maintenance, and enforcement of rules governing the behavior of County judges, including judicial officer Defendants herein.
- 563. That the different Agency's in the USA, COA and VA have ignored the criminal acts and threats on Janice and her girls lives to protect one of there own. As such, these Defendants' rulemaking and enforcement influence gives them the power, though not the authority, to permit unconstitutional conduct by refraining from discipline of it, and to discipline judicial conduct which is not a violation of any law. Such power foreseeably influences judicial behavior toward litigants, including Plaintiff herein.
- 565. These "line-drawing" roles of COMMISSION employees are described in detail in the Judicial Cannons.
- 566. In addition to their PROFESSIONAL DUTIES, Defendants are bound by special duties in the performance of their job responsibilities in drawing lines. Those "line-drawing duties" include the duty to draw and only enforce lines which are consistent the mandates and restrictions which govern the behavior of those whom they have the power and ability to influence or control, including all provisions of the

Construction of the United States and the Constitution of the State of Virginia.

- 567. Any CULPABLE or UNREASONABLE failure to draw lines consistent with the laws that govern judicial behavior constitutes a violation of Defendants PROFESSIONAL DUTIES. Such breaches causing reasonably foreseeable injury constitutes a deprivation of SUBSTANTIVE DUE PROCESS, and perhaps other deprivations, to the person or entity injured. 568. Relevant to this litigation, the laws under which the Defendants and others exercise line-drawing control include those identified in the Constitution of the United States, the Constitution of the State of Virginia, the Virginia Code of Judicial Ethics, Civil Rights Criminal and Civil Statutes, as well as those laws and rules identified as JUDICAL PROFESSIONAL DUTIES, CONSTITUTIONAL PROFESSIONAL DUTIES, and oaths of office of judicial officers.
- 569. Pursuant to their own PROFESSIONAL DUTIES under the Constitution of the State of Virginia Defendants have no discretion to draw lines inconsistent with these laws, rules, codes, oaths, and cannons governing judicial officials.

  570. By their power and ability to draw lines, Defendants and other Commission employees exercise significant control over behavior of Judges in Virginia jurisdictions. Because many acts of judges are uniquely immunized or insulated from ordinary civil accountability, Defendants, and other Commission employees represent the only true influence to enforce—or fail to enforce—laws and duties governing judicial behavior.
- 571. Civil rights immunity is not a defense to discipline by the Commission or its employees.
- 573. Defendants failure to draw lines faithful to laws and the PROFESSIONAL DUTIES derived therefrom effectively abrogates those laws and judicial offer PROFESSIONAL DUTIES thereunder, as no other effective means for enforcing such duties exists.
- 574. Defendants have no discretion to abrogate the Constitution of the United States or the State of Virginia, or any other law, rule, or legislation.
- 576. On information and belief, Defendants have participated in line drawing in such a way as to effectively and illegally abrogate many laws imposing CONSTITUIONAL and JUDICIAL DUTIES on County judicial officers in Virginia jurisdictions, thereby giving express and implied permission to violate those laws.
- 577. In so doing, Defendants have caused or contributed to conditions in which judicial officers are unrestrained by the laws, duties, and responsibilities of their offices and constitutional restrictions on their acts.
- 578. Such conditions have foreseeably lead to a culture of deliberate indifference which precipitated the illegal acts of the judicial officers as described in the Janice Jailing, MALICIOUS PROSECUTION, OBSTRUCITON OF JUSTICE, RACKETEERING, and elsewhere throughout this Complaint.
- 579. As an actual and foreseeable result of Defendants' line-drawing to abrogate CONSTITUIONAL and JUDICIAL DUTIES governing judicial officer defendants herein, Janice has been deprived and injured as
- elsewhere alleged of rights, privileges, and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; ACCESS TO JUSTICE; EXPRESSION, PRIVACY, and ASSOCIATION; and EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 580. As an actual and foreseeable result, Janice has been deprived, damage, and injured in a nature and amount to be proven at trial.

## Obstruction of Justice Failure to Discipline Judicial Defendants 42 U.S.C. § 1983

581. This is a Claim for deprivation of rights under color of law for Defendants facilitation and toleration of illegal obstruction of justice creating a widespread culture of deliberate indifference causing foreseeable obstruction of justice and retaliation, constituting constitutional injury to PLAINITFFS as elsewhere alleged.

582. All prior paragraphs are re-alleged and incorporated as if set forth in full.

583. The power and duty to discipline judges includes the duty to protect the process and rights of citizens for doing so. Causing or allowing interference with such processes or afterward in retaliation constitutes a CULPABLE and UNREASONABLE breach of Defendants PROFESSIONAL DUTIES, foreseeably resulting in constitutional deprivations of the complaining citizens and others thereby subject to retaliation or chilled out of fear of same.

584. Such deprivations of rights of citizens to utilize the complaint process relate to rights, privileges and immunities to EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE; and SUBSTANTIVE DUE PROCESS. Such interference shall hereafter be referred to as "OBSTRUCTION OF JUSTICE."

585. Elected Officials, Commission on Judicial Performance employees are uniquely empowered and therefore bound to protect California litigants' rights under state and federal law to petition the Commission and its employees for grievances against such officers; speak freely about judicial officers and their misconduct both within and outside of the Commission's processes; seek and obtain unfettered, unimpeded, and safe access to such processes; maintain privacy in relation to commission matters and investigations; and preserve procedural and substantive due process rights through their management of complaints, discipline, and protection of witnesses and parties to that process.

586. The failure to enact, maintain, policies and practices which assure the integrity of the complaint process foreseeably leads to opportunity and actual retribution by judges who, attune to Defendants and others' impotence to protect their witnesses, creates an environment of deliberate indifference and inadequate protection of witnesses in the judicial oversight process. As a result, judicial officers have received a "green light" to retaliate against complaining litigants in manners similar to those alleged herein.

587. Defendants are aware that judicial officials are keenly sensitive to public criticism, including complaints by citizens. *Professional Judges* at 1278-79. They are also aware that City / County judges have substantial, often unfettered, discretion to abuse legal process and obstruct justice to retaliate with immunity against citizens who make complaints against a City / County judge should the complaint be revealed to the judge. *Landmark Commc'ns*, *Inc. v. Virginia*, 435 U.S. 829, 835 (1978); *Supreme Court of Virginia v. Consumers Union of U. S., Inc.*, 446 U.S. 719 (1980).

588. On information and belief, Defendants are aware of numerous prior incidents of OBSTRUCTION OF JUSTICE by judicial officers within their power and duty to control, including each judicial officer herein, some of which are similar to the acts of the Janice Jailing COORDINATORS.

589. On information and belief, Defendants, and others maintain policies, practices, habits and customs permitting the ability of judges to retaliate successfully, thereby inhibiting, and impeding exercise of litigants, including PLAINITFFS,' rights. Such policies consist, inter alia, of (1) inadequate investigation of original complaints brought by litigants who are dramatically disfavored in the proportion of investigations undertaken and ignored by Defendants and others and (2) Inadequate discipline for interference and retaliation; and (3) inadequate and assurances and protections to litigants during the complaint process to assure complaints are properly treated, including advising litigants of the availability of the available means to protect them and discipline judicial officers who retaliate.

590. Defendants are further aware that litigants face unequal risks for retaliation due to unequal discipline for litigant complaints in comparison with complaints by government lawyers. <u>Published Commission statistics show that as little as 2% of all complaints by litigants are acted upon, meaning that litigants who make such complaints remain at jeopardy within the jurisdiction of the judicial official and/or his colleagues, and therefore subject to retribution. By contrast, approximately 50% of complaints by government prosecutors or other judges themselves are acted upon.</u>

591. Such inequality inflicts a deprivation of state and federal Constitutional rights to Equal Protection on litigants, including Plaintiffs herein.

592. Defendants are also aware that City / County judges regularly refuse to recuse themselves in cases in which they have obvious conflicts of interest, including conflicts due to complaints filed by litigants appearing before them.

- 593. Under Defendants habitmated tolerance for judicial misconduct, disregard of ethical canons and constitutional restrictions on abuse of authority, the mere act of identifying a litigant in an investigation subjects her to jeopardy by officer complained of or the officer's colleagues acting in lockstep sympathy.
- 594. That failure, combined with Defendants impotence to swiftly punish the same in deterrence, makes the act of entrusting a complaint to Defendants at outrageous risk of constitutional injury by county judicial officers behaving as a steerage-fare gallery of feckless petit-tyran, perversely immunized under the honor of patriots to include frolic, whimsy, and caprice. What shame a profession of reason today endures.
- 595. Defendants, by virtue of their awareness of the ongoing DUE ADMINISTRATION OF JUSTICE and ENGAGEMENTS, had a duty to protect Plaintiffs in COMPLAINTS and DUE ADMINISTRATION OF
- JUSTICE—either by effectively protecting Plaintiffs' and their members' identity, or, if not possible, by otherwise assuring that retribution against such citizens is met with swift deterring discipline.
- 599. Such acts have caused Janice fear and distress, causing her to refrain from subjecting herself to further illegal retribution in accessing courts - but, on the other hand Defendants have tortured her so she has no other choice especially with there newest suite to make her homeless for illegal ill-gotten legal fees she was jailed for.
- 600. The USA, VA and COA acts and failures to act have also foreseeably led to the Jailing of Janice, MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, OBSTRUCITON OF JUSTICE, and RACKETEERING.
- 601. Defendants failures in responding to the history of complaints against judicial defendants herein, including have thereby deprived Janice of rights, privileges and immunities relating to EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE: and SUBSTANTIVE DUE PROCESS as elsewhere alleged.
- 602. As an actual and foreseeable result, PLAINITFFS have been deprived, damage, and injured in a nature and amount to be proven at trial.

#### Claim 5.3 42 U.S.C. §1983

- 613. This is a Claim against Defendants for deprivation of rights under color of law based upon the same facts alleged against them under racketeering Claims for Relief
- 614. Plaintiff re-alleges and incorporates by reference RICO Counts for Relief.
- 615. In performing each acts attributed to them in Racketeering Counts, Defendants have CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, foreseeably depriving Janice of rights relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION; EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT.
- 616. As an actual and foreseeable result, Plaintiffs have been deprived, damaged, and injured in a nature and amount to be proven at trial.

#### Claim 5.4 **Deprivation of Equal Protection** 42 U.S.C. § 1983

- 626. This is Claim against Defendants for deprivation of rights under color of law pursuant to 42 U.S.C. § 1983 for implementing, maintaining, and enforcing policies and practices in violation of PLAINTIFS' rights, privileges and immunities to EQUAL PROTECTION, causing foreseeable injury to Plaintiffs as elsewhere alleged.
- 627. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 628. On information and belief, Defendants rule-making responsibilities include power and influence to discriminate on the basis of categories or classes of, litigants, Claims, or judicial officials.
- 629. On information and belief, Defendants create and maintain policies, rules, and practices discriminating against each of the EQUAL PROTECTION CLASSES, and giving special exceptions to family court judges with jurisdiction over litigants within the EQUAL PROTECTION CLASSES.
- 630. On information and belief, this unequal treatment is motivated by invidious discrimination against the EQUAL PROTECTION CLASSES.
- 631. On information and belief, this unequal treatments results in complaints from litigants within the EQUAL PROTECTION CLASSES being prejudicially adjudged as less credible, viable, or important. Such judgments are based on invidious prejudices that family court litigants are "litigants behaving badly," a "bunch of borderlines," "angry about everything" lack

- credibility, importance, or legitimacy, or otherwise inferior or unequal to other litigants. See Exs. 1, 2; EQUAL PROTECTION CLASSES infra.
- 632. For similar reasons, litigant complaints against Family Court judges are treated differently because of what has been described as a "Domestic Relations Exception" to the Constitution of the United States and Constitution of the State of Virginia.
- 633. Despite such error, Defendants, along with other present Defendants, abide the misconception in their practices, effectively discriminating against complaints alleging constitutional deprivations by judges, behaving by word or deed as if court litigants have fewer constitutional rights to offend.
- 634. Such a policy and practice constitutes deprivation of PLAINITFFS' rights, privileges, and immunities relating to EQUAL PROTECTION, and has inflicted foreseeable injury to Plaintiffs as members of each EQUAL PROTECTION CLASS as elsewhere described.
- 635. As an actual and foreseeable result of the acts and omissions of Defendants described hereinabove, Plaintiffs have been deprived, damages, and injured as elsewhere alleged in a nature and amount to be proven at trial.

#### COUNT 6 Supervisory Liability 42 U.S.C. § 1983

- 636. This is a Count containing Claims against Defendants who maintain supervisory power and responsibility over other Defendants (SUPERVISING DEFENDANTS). The Claims of this Count allege injury under 42 U.S.C. § 1983 caused by breach of those duties foreseeably causing deprivation of rights, damage, and injury.
- 637. Each SUPERVISING DEFENDANT at all times was under the following SUPERVISORY DUTIES:
- A. Policy and Rulemaking: Powers and duties to create, modify, and maintain policies, rules, and restrictions to govern subordinates in compliance with all laws and each SUPERVISING DEFENDANT's and each of their subordinate's PROFESSIONAL DUTIES.
  - b. *Train*: Duties to prepare subordinates for foreseeable risks of causing constitutional deprivation which the subordinate could not be expected to anticipate, and duties to continue and update such training to accommodate known errors and changes in laws and circumstances;
  - c. Oversight: Powers and duties to oversee, communicate and interact with, direct, train, and guide subordinates to assure their acts are in accordance with law and each subordinate's PROFESSIONAL DUTIES.
  - d. Enforcement: Each SUPERVISING DEFENDANT had duties to enforce policies, and all laws and restrictions relating to their subordinate's PROFESSIONAL DUTIES through discipline and if necessary termination.
  - 638. Each supervisor further was at all times bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL, SOCIAL WORKER, FIDUCIARY, and at certain times elsewhere alleged, CONTRACTUAL.
  - 639. On information and belief, each SUPERVISING DEFENDANT knew or should have known of:

    Prior disregard of PROFESSIONAL DUTIES and laws, and deprivation of rights by their subordinates named herein;
    The breaches of PROFESSIONAL DUTIES and laws and deprivation of rights among their subordinates as alleged herein; Plaintiffs' DUE ADMINISTRATION OF JUSTICE, CLAIM AND DEMAND, MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and NESTHUS OBSTRUCTION OF JUSTICE; Each Scheme and Artifice to Defraud, ENTERPRISE, and CRIMINAL CONSPIRACY alleged under the RICO
  - 640. On information and belief, each SUPERVISING DEFENDANT had further specific knowledge of prior acts by their subordinates, supervisors and/or trainees causing constitutional injury similar to that complained of by Plaintiffs.

**ALLEGATIONS infra.** 

- 641. Knowing of these facts, each SUPERVISING DEFENDANT had a duty to investigate, remedy, correct, discipline, retrain, and/or terminate those over whom they had the power to influence or control to conform the behavior of those they supervised to law.
- 642. In CULPABLE and UNREASONABLE breach of one or more SUPERVISORY DUTIES, each SUPERVISING DEFENDANT implemented customs, policies, or practices that created unreasonable risks that subordinates would perpetrate the constitutional injuries elsewhere complained of by Plaintiffs, including: Directing, rewarding, encouraging, or acting with deliberate indifference to the actions of subordinates which led to Plaintiff's constitutional injuries; Failing to change the customs, practices, or policies, or employ corrective practices for subordinates, after having knowledge of actual or threatened constitutional injury; and Facilitating, acquiescing to, endorsing, or ratifying HARRASMENT AND ABUSE.

643. Each SUPERVISING DEFENDANT UNREASONABLY and CULPABLY failed to implement remedial measures to prevent further constitutional injuries to Plaintiffs and those similarly situated.

# Claim 6.1 Supervisor Liability Against the City of Alexandria, VA, VSB, USA 42 U.S.C. § 1983

- 644. This is a Claim for failure to supervise against the heads of the VA, VSB COA who had official believed at times relevant to this Action, for failure to oversee subordinates as alleged below.
- 645. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 646. That at all times someone the Clerk of Court or other Supervisor type's were aware of the Criminal Acts taking place and ignoring the acts of Defendants provides services as elsewhere alleged, including the criminal ENTERPRISES.
- 647. On information and belief, Defendants UNREASONABLY failed to perform one or more SUPERVISORY DUTY over his or her subordinates, foreseeably causing or permitting the subordinate's acts as elsewhere alleged in Janice's Jailing, CLAIM AND DEMAND, and RACKETEERING, causing deprivation of rights of SUBSTANTIVE DUE PROCESS.
  648. By virtue of the CULPABLE and UNEASONABLE beaches of PROFESSIONAL DUTIES by each subordinate as elsewhere alleged, each SUPERVISING DEFENDANT has breached one or more SUPERVISORY DUTIES, directly and indirectly depriving Plaintiffs of rights as elsewhere alleged, causing injury in a nature and amount to be proven at trial.

#### COUNT 7 42 U.S.C. 1983

Municipal Liability, VA Courts Liability, USA Federal Courts Liability, Judicial Council Liability, ADMINISTRATIVE OFFICE OF THE COURTS, City of Alexandria, Prince William County

713. This is a Count containing Claims Defendants of Municipal Liability, VA Courts Liability, USA Federal Courts Liability, Judicial Council Liability, ADMINISTRATIVE OFFICE OF THE COURTS, City of Alexandria, Prince William County for deprivation of rights under color of law against "beneath State-level" entities under 42 U.S.C. §1983

714. Defendants to this Count are "governments beneath the state level" within the definition of that term in Board of Comm'rs v. Brown, 520 U.S. 397 (1997).

715. Each municipal entity herein was at all times bound under the following PROFESSIONAL DUTIES: CONSTITUTIONAL, SUPERVISORY, MUNICIPAL, SOCIAL WORKER, FIDUCIARY, and at times elsewhere alleged, CONTRACTUAL.

716. Each Defendant created, maintained, and enforced maintained policies, customs, rules, procedures, traditions, practices, including "line-drawing" activities as elsewhere detailed ("policies") and permitted and directed behaviors by policymakers themselves, causing or permitting deliberate indifference and a culture of deliberate indifference to foreseeable constitutional injury of the type caused to Plaintiff Janice and her in ability to get a fair trial, a Judge with Jurisdiction, to protect Janice from criminal acts of other. in the DDIJO and MALICIOUS, PROSECUTION, and PROSECUTORIAL MISCONDUCT, and OBSTRUCTION OF JUSTICE.

- 717. Administrative Director of the Courts is accountable to the council and the Chief Justice for the performance of the Administrative Office of the Courts. The Administrative Director's authority is limited to accomplishing the council's goals and priorities. A chart depicting the relationship between the ADMINISTRATIVE OFFICE OF THE COURTS, JUDICIAL COUNCIL, and other related defendants. The JUDICIAL COUNCIL or its employees have no authority to perform any "judicial act" as that term is defined in Ashelman v. Pope, 793 F.2d 1072, 1075 (9th Cir. 1986).
- 718. Said policies further permitted or were deliberately indifferent to the conduct, participation in, operation, monitoring, discipline, and control of each ENTERPRISE and ENTERPRISE PERSON in a state wide affiliated Enterprise operation that participated in Janice Jailing.
- 719. Each Defendant further failed to properly train its employees prior to its employee's acts elsewhere alleged to have caused constitutional deprivation, damage, and injury, foreseeably resulting in the injury alleged.

#### Respondent Superior Liability

754. This is a Claim alleging respondent superior liability against VSB and JIRC for the actions of their agents and employees pursuant to common law Principles of respondent superior.

### Claim 8.1 Against VSB

755. All prior paragraphs are re-alleged and incorporated as if set forth in full.

756. VSB is an association to support, facilitate, and coordinate the Virginia State Lawyers /

legal industry. The responsibility of the diverse legal community, the VSB aims to support and inform the States lawyers, but also the public and the community. Programs help clients find qualified lawyers, resolve disputes and educate Virginians is their claim. The VSB has had the Ethics Guru send Janice's information of criminal activity to his home instead of to his office. That the Bar is supported off the Lawyers and if you look at the lawyers disciplined they are not usually part of the Old Boys Network. Janice went she went to them for help was told to go away. We don't discipline our favorites.

757. At all times relevant hereto, Defendant VSB was the superior, employer, and principal of majority of Defendants that

COORDINATOR, , and each ENTERPRISE PERSON and a conductor and participant in each ENTERPRISE.

758. Each act attributable to each Janice Jailing COORDINATOR, and each ENTERPRISE PERSON and a conductor and

participant in each ENTERPRISE Defendant is attributable to VSB.

759. As an actual and foreseeable result of the acts of each subordinate, agent, and employee Defendant, Plaintiffs have been damaged and injured in a nature and amount to be proven at trial.

# COUNT 9 Conspiracy to Interfere With Rights 42 U.S.C. § 1985 Against All Defendants

764. This is a Count for conspiracy to interfere with rights under 42 U.S.C. § 1985 against COORDINATOR Defendants based on the Janice's Jailing in Count 1, based on the non-immune acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, Defendants on acts alleged in Count 5, their supervisors in Count 6, and municipalities in Count 7 (collectively COLOR OF LAW DEFENDANTS).

#### Claim 9,1 42 U.S.C. 1985(1) Against All COLOR OF LAW DEFENDANTS

765. This is a Claim by Janice against all COLOR OF LAW DEFENDANTS as alleged in each Claim of Counts 1, 3-7, for Preventing Officer from Performing Duties under 42 U.S.C. § 1985(1) against Janice ASSAULT COORDINATOR Defendants based on the Jailing of Janice in Count 1, based on the non-immune acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, on acts alleged in Count 5, and acts of supervisors and municipalities in Counts 6 and 7.

766. All prior paragraphs are re-alleged and incorporated as if set forth in full.

772. In committing the acts alleged in Counts 1-5 above, COLOR OF LAW DEFENDANTS and each of them conspired as detailed in each Count:

A.To prevent, by force, intimidation, or threat, Janice from accepting or holding a POSITION UNDER THE UNITED STATES; to prevent Janice from any and all employment or investment opportunities

773. As an actual and foreseeable result, Janice has been deprived of rights, privilege, and immunities as alleged in Counts 1, 3-7, damaged or injured in a nature and amount to be proven at trial.

# Claim 9.2 Conspiracy to Interfere with Civil Rights 42 U.S.C. 1985(2) Against COLOR OF LAW DEFENDANTS

774. This is a Claim by Janice for obstructing justice; intimidating party, witness, or juror under 42 U.S.C. 1985(2) against Janice COORDINATOR

775. All prior paragraphs are re-alleged and incorporated as if set forth in full.

776. Defendants and each of them conspired as detailed in each Count 1, 3-7 above:

777. Plaintiff is Catholic and has been harassed for religious beliefs by Defendants. Subject to historic de facto and de jure invidious discrimination in violation of the 5<sup>th</sup> and 14th Amendment rights to Equal Protection of the Laws (collectively "EQUAL PROTECTION CLASSES"):

785. No Defendant acting under color of law may legally act with discretion in the absence of jurisdiction established by the Constitution of the State of Virginia, United States Constitution, statutes, laws, contract, or regulation.

786. Plaintiff' membership in and advocacy for the EQUAL PROTECTION CLASSES was known to and targeted by Defendants prior to her jailing.

787. Defendants CULPABLY undertook each of the acts ascribed to them with the intent to cause Janice Jailing MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and OBSTRUCTION OF JUSTICE to deprive Plaintiff, of them, of equal protections, privileges, and immunities, including rights related to their PUBLIC BENEFIT ACTIVITIES, DUE ADMINISTRATION OF JUSTICE, and rights as advocates for and on behalf of the EQUAL PROTECTION CLASSES.

788. In performing the acts alleged above, COLOR OF LAW DEFENDANTS conspired to deter, injure, Plaintiff, by MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and OBSTRUCTION
OF JUSTICE, from attending or testifying freely, fully, and truthfully as a party or witness in Plaintiffs' PUBLIC BENEFIT ACTIVITIES, or from testifying to any matter, freely, fully, and truthfully; Plaintiff in their property for lawfully enforcing, or attempting to enforce, the rights of Plaintiff, and each of them, as members of each EQUAL PROTECTION CLASS, to the equal protection of the laws. Hereinafter collectedly referred to as the EQUAL PROTECTION CONSPIRACY.
789. As an actual and foreseeable result, Plaintiffs have been deprived of rights, privileges and immunities as set forth in Counts 1, 3-7.

#### Claim 9.3 Conspiracy to Interfere with Civil Rights 42 U.S.C. 1985(3)(a) (b)(c) Against all COLOR OF LAW DEFENDANTS

790. This is a Count for Depriving persons of rights or privileges under 42 U.S.C.1985(3)(a) against Janice, Defendants based on the Jailing in Count 1, DEFENDANTS based on the non-immune acts in the MALICIOUS PROSECUTION and PROSECUTORIAL MISCONDUCT in Count 3, Defendants based on the OBSTRUCTION OF JUSTICE in Count 4, on acts alleged in Count 5, and supervisor and municipal entities in Counts 6 and 7.

791. All prior paragraphs are re-alleged and incorporated as if set forth in full.

792. In committing the acts alleged against them in each of Counts 1, 3-7, COLOR OF LAW DEFENDANTS CULPABLY acted in conspiracy for the purpose of depriving Plaintiffs individually as members of and advocates for the EQUAL PROTECTON CLASSES, of the equal protection of the laws and equal privileges and immunities under the laws, including but not limited to their PUBLIC BENEFIT ACTIVITIES, the DUE ADMINISTRATION OF JUSTICE, and retaliating for exercise thereof, causing Plaintiffs reasonably foreseeable and injury therefrom.

793. As an actual and foreseeable result, Plaintiffs have been deprived of rights, privileges and immunities, damaged and injured in an amount according to proof at trial.

#### **COUNT 10**

#### Failure to Prevent or Aid in Preventing Deprivation of Constitutional Rights 42 U.S.C. § 1986 Against COLOR OF LAW DEFENDANTS

802. This is a Count for Failure to Prevent or Aid in Preventing Deprivation of Constitutional Rights under 42 U.S.C. § 1986 against Janice.

803. On information and belief, Defendants to this Count had knowledge of all relevant facts alleged in this Complaint, including that the acts conspired to be done and committed as alleged in Counts 1, 3-7 were about to be committed. 804. Defendants to this Count, and each of them, by virtue of their relationships with each other defendant, their authority under law, and PROFESSIONAL DUTIES, had power to prevent or aid in preventing the commission of the same.

- 805. Defendants to this Count, and each of them, neglected or refused to exercise their powers to prevent or aid in preventing the commission of the same.
- 806. The acts as alleged herein were in fact committed as alleged.
- 807. As an actual and foreseeable result, Plaintiffs have been deprived, damaged, or injured in a nature and amount to be proven at trial.

#### **COUNT 11**

#### Ilona Grenadier et al TERRORISM Breach of Covenant of Good Faith and Fair Dealing 42 U.S.C. § 1983

- 808. This is a Count alleging breach of contract, fraud, extortion, bribery and abuse of process centered on the actions of Defendants Grenadier Law, Ilona, David and Erika acting under color of law, and related deprivations of rights under 42 U.S.C. § 1983
- 809. That the above Defendants conspired to steal from Janice from on or around December of 1986.
- 810. That Ilona acted as Janice's lawyer to protect herself. The documents and letters will show this.
- 811. That on the morning of July 7, 2990 Lawyer Ilona would lie to Janice as she was waiting results to hear how "A" who had been born the night before with an emergency C section with heart issues how she was.
- 812. Lawyer Ilona manipulated a \$30,000. Commission that Mays & Valentine aka Troutman Sanders with her collusion would further the manipulation in the days and weeks to come.
- 815. These representations made were if you want your child ever seeing her father out of jail you had better do this. In return you will get a note due in 30 years with 10 % interest. Ilona has as a lawyer said the note would be safer with her. Ilona a Lawyer refused to hand over such note.
- 816. Ilona breached the contracts and representations by committing extortion, abuse of process, and by failing to abide by each of the above referenced promises, his PROFESSIONAL DUTIES, including duties of disclosure, loyalty, honesty, and good faith, as well as breaching one or more provision of the written contract.
- 817. Ilona exceeded his authority in filing false and misleading documents with the courts and several other agencies. Ilona has been allowed criminal behavior because of a perceived Power in the Old Boys Network of Virginia.
- 818. Ilona Attempting to intimidate, distress, harm, defraud, extort, and rob Janice; is a pattern and practice along with her participation in having Janice Jailed. All lawyers and Judges were aware this was illegal and did it anyways to intimidate and torture a citizen in the United States of America, should worry everyone.
- 910. That the attempts to stop Janice by Defendants accusing her of Extortion was criminal in itself and was made able by the Commonwealth Attorney of the COA, the COA Police..
- 829. Janice was also defrauded by Defendants n a car they have stolen and sold with forged documents alleged in understanding the nature and extent of the enterprise and conspiratorial relationships between the other Defendants giving them a perceived Power.
- 830. As a result of such fraud, duress, undue influence, breach of fiduciary and other PROFESSIONAL DUTIES, Janice has been oppressed, deterred, and unwillingly delayed to initiate this Action until August 20, 2013.

#### Claim 11,2

#### Fraud

#### **Against Defendants Hona**

- 843. This is a Claim for fraud and negligent misrepresentation by Janice against Defendants.
- 844. All prior paragraphs and all paragraphs below regarding each RICO Count 1, below, are re-alleged and incorporated as if set forth in full.
- 845. At all relevant times, other Defendants acted as an agent and representative for Ilona.
- 846. Ilona's written and oral representations described above were intentional or negligent, false when made, material, and reasonably relied upon Janice
- 847. As an actual and foreseeable result, Janice has been injured in a nature and amount to be proven at trial.

#### Claim 11.3

Intentional Infliction of Emotional Distress; 42 U.S.C. § 1983; Against all Ilona TERRORISM Defendants

- 848. This is a Claim for intentional infliction of emotional distress by Janice against Ilona and her gangs
- 849. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 850. Ilona's TERRORISM detailed above and throughout were CULPABLE, extreme and outrageous, malicious, fraudulent, and oppressive, reasonably and foreseeably causing Janice severe emotional distress.
- 851. Ilona was at all times acting as an agent, co-conspirator, collaborator, subordinate, and employee of each other Ilona TERRORISM Defendant.
- 852. In committing the acts described in this Complaint, Ilona, Grenadier at Law and her gang of other Defendants and John Does, . foreseeably damaged, injured, and deprived Janice or caused her to be deprived of rights, privileges, and immunities relating to SUBSTANTIVE DUE PROCESS; PROCEDURAL DUE PROCESS; SEARCH AND SEIZURE; EXPRESSION, PRIVACY, and ASSOCIATION; ACCESS TO JUSTICE, causing deprivation, damage, and injury in a nature and amount to be proven at trial.

# Claim 11.4 Failure to Supervise Defendants 42 U.S.C. 1983 and Cal. Const. art. I, § 26

- 873. This is a Claim against VA, COA and USA for supervisory failures causing deprivation of Janice's rights under color of law pursuant to 42 U.S.C. 1983
- 874. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 875. VA, COA and USA SUPERVISING DEFENDANTS, and each of them, at all times had the power to oversee, supervise, train, discipline Ilona and her gang. so as to prevent or aid in preventing the commission of Ilona and other Defendants acts as alleged herein.
- 876. That VA, COA and USA had the administrative and supervising authority to prevent the Jailing of Janice.
- 878. VA, COA and USA are CULPABLY AND UNREASONABLY permitted the Jailing of Janice so to allow Defendants to commit the fraud, abuse of process, extortion, and terror against Janice.
- 879. DEFENDANTS knew or should have known: Ilona's history of fraud, abuse, and illegal conduct described herein; The pattern of illegal activities of the CONSPIRACIES and CRIMINAL
- ENTERPRISES herein;; and The FEDERAL ENGAGEMENT of Plaintiffs and others regarding Defendants, the ENTERPRISE and CRIMINAL CONSPIRACY operators and affiliates.
- 880. After learning of Ilona's "S history of illegal conduct, fraud, and abuse, Ilona's SUPERVISING DEFENDANTS had a duty to investigate, oversee, re-train, discipline, and/or terminate those over which they had the power to influence or control including Grenadier Law.
- 881. Supervising Defendants failed to implement remedial measures such as reassignment, removal or other disciplinary actions to prevent further constitutional injuries to Plaintiffs and those similarly situated.
- 882. Having this knowledge, Ilona's SUPERVISING DEFENDANTS neglected or refused to prevent or aid in preventing the same.
- 887. Despite the knowledge of past/prior acts causing or likely to cause constitutional injury, Ilona's SUPERVISING DEFENDANTS took no and/or inadequate corrective action, and in fact encouraged the acts that caused or were likely to cause constitutional injury.
- 888. In committing each act as described in this Count, Ilona and other Defendants SUPERVISING
- DEFENDANTS CULPABLY and UNREASONABLY breached one or more PROFESSIONAL DUTIES, depriving Janice or causing him to be deprived of rights privileges and immunities relating to SEARCH AND SEIZURE; SUBSTANTIVE DUE PROCESS; EXPRESSION, PRIVACY, and ASSOCIATION;
- EXCESSIVE FORCE; and CRUEL AND/OR UNUSUSAL PUNISHMENT, causing deprivation, injury, and damage in a nature and amount to be proven at trial.

# COUNT 12 Deprivation of SUBSTANTIVE DUE PROCESS 42 U.S.C. § 1983 Against COLOR OF LAW DEFENDANTS

889. This is a Count against each COLOR OF LAW Defendant based on acts alleged against each such Defendant in each Claim herein. This Count asserts that each Defendant's UNREASONABLE and CULPABLE acts under color of law in breach of a duty identified below constitute a deprivation of substantive due process under both the Constitution of the United States and the Constitution of the State of Virginia to all entities foreseeably injured therefrom.

890. At all times relevant to this Action, each COLOR OF LAW Defendant and defendant acting under color of law owed one or more PROFESSIONAL DUTIES to each Plaintiff as follows: CONSTITUTIONAL: For any Defendant acting under color of law, the following non-discretionary duties: The duty to exercise color of law powers only in the presence of legal authority or jurisdiction provided under enabling legislation, rules, charters, or constitutions, pursuant to VA Const.

The duty to protect, uphold, and defend the laws and the Constitutions and laws of the United States and the State of Virginia; The duty to act only in the public interest; provide only honest government services:

The duty to avoid all conflict, undue influence, bribery, self-dealing, bias, nepotism;

The duty to commit no reasonably foreseeable deprivation of clearly established civil rights;

The duty to create or inflict no harm unless specifically authorized after due process of law. Pursuant to of the Constitution of the State of Virginia, each Defendant's CONSTITUTIONAL duties for administrative, law enforcement, judicial, quasi-judicial, and prosecutorial functions identified in this Complaint are "mandatory" and "prohibitory." As such, no entity, including but not limited to defendants herein, acting

under color of Virginia state law may exercise discretion to perform any act which violates any CONSTUTIONAL DUTY, and no valid law of the State of Virginia may empower an act under color of law which violates any CONSTITUTIONAL DUTY

FIDUCIARY: Duties of trust and loyalty of treating pecuniary interests of named or reasonably foreseeable beneficiaries equal to own. Such duties apply to certain functions of Defendants acting under color of law; JUDICIAL: Duties to ensure due process and protect rights of all of those within their jurisdiction; all duties enumerated in Canons and related codes of judicial ethics. Such DUTIES apply to all functions of all judicial officers performing any administrative or judicial function;

ATTORNEY/ADVOCATE: Duties of professional competence, loyalty, zealous advocacy and those specifically articulated in the Model Code of Professional Conduct. Such duties apply to all function of all attorneys and certain functions of social worker acting as advocates or advisors

SOCIAL WORKER: Duties of professional competence, act only in public interest;

SUPERVISORIAL: Duties to oversee, supervise, train, instruct, guide, monitor, discipline, and terminate subordinates; to exercise power to prevent or aid in preventing breaches of others with power to influence or control; SPECIAL RELATIONSHIP: Duties to affirmatively act in situations not otherwise requiring action founded on the existence of a prior engagement, bond, or other relationship;

CREATION OF DANGER: Duties to affirmatively act in situations not otherwise requiring action founded upon the actor's creating a danger or risk to which the duty to act in preventing harm from the risk arises;

CONTRACTUAL: Specific duties under contract; duty of good faith and fair dealing;

MUNICIPAL: Duties of all governments to enact and enforce only constitutional rules, laws, policies, customs, habits, behaviors or procedures; duty to act to prevent foreseeable deprivation of constitutional injury; duty to take action and/or avoid deliberate indifference to actual or likely constitutional injury within authority to act; THERAPEUTIC: For all mental health professionals, duties to observe all professional standards relevant to their respective professional licensure, best practices, and specialty standards; Duty to do no harm. Such duties apply to Domestic Dispute Industry Professional Service providers.

891. In performing each act alleged herein, each Defendant bound at all relevant times by one or more PROFESSIONAL DUTY as elsewhere specified.

892. Said PROFESSIONAL DUTIES under which each Defendant to each Count herein acted extended at all times to each Plaintiff named in each Count.

893. By virtue of each Defendant's PROFESSIONAL DUTIES, PLAIINTIFFS at all relevant times possessed reciprocal rights to SUBSTANTIVE DUE PROCESS in the performance of those duties of the Constitution of the State of Virginia and the Fifth and Fourteenth Amendments to the United States Constitution.

894. For each entity acting under color of Virginia state law, their breach of a PROFESSIONAL DUTY by CULPABLE or UNREASONABLE conduct as elsewhere alleged, setting in motion foreseeable injury, constitutes a deprivation of SUBSTANTIVE DUE PROCESS of those injured.

895. As elsewhere alleged each Defendant breached one or more of said PROFESSIONAL DUTIES UNREASONABLY or CULPABLY, constituting a deprivation of SUBSTANTIVE DUE PROCESS under the Fifth and Fourteenth Amendment to the United States Constitution, causing damage and injury in a nature and amount according to proof at trial.

COUNT 13

#### 42 U.S.C. § 1983 Against Each Defendant

896. This is a Claim for trespass under color of law for acts caused in *coram non judice* by each Defendant as elsewhere alleged.

897. All prior paragraphs are re-alleged and incorporated as if set forth in full.

898. Each Defendant acting under color of state law is empowered and restrained from acting by virtue of the respective constitutions, charters, and articles of incorporation, appointments, or other entity formation documents describing the Defendant's jurisdiction. To the extent the powers are derived from the Constitution of the State of Virginia, such powers and restrictions are "mandatory" and "prohibitory" (nondiscretionary) under the Virginia Constitution.

899. In causing injury as described in each Count and Claim herein, Defendants acting under color of law, and each of them, acted in excess of and in the complete absence of jurisdiction, causing "off the reservation" injury in violation of Plaintiffs' rights, privileges, and immunities.

900. In exceeding the limits of their authority as elsewhere alleged in each Count and Claim herein, Defendants, and each of them, committed a trespass to the property, persons, rights, privileges, and immunities of Plaintiffs, causing a deprivation of same, and are therefore strictly liable for all injury foreseeably resulting therefrom, including each injury identified in each Claim herein, in a nature and amount to be proven at trial.

### COUNT 14 Unjust Enrichment

901. All prior paragraphs are re-alleged and incorporated as if set forth in full.

902. In reliance on Count 14 Defendants' acts and omissions, Plaintiff has been wrongfully induced to retain Count 14 Defendants, and as a result has paid in excess to Defendants to be had.

903. As an actual and foreseeable result of Defendant Defendants' misfeasance and malfeasance described herein, Defendants have been unjustly enriched in an amount paid by Plaintiff the exact amount to be proven at trial.

#### **COUNT 15**

#### False designation of origin, false description 15 U.S.C. § 1125 Against All Defendants

904. This is a Count for false description of services against each Defendant as indicated under 15 U.S.C. § 1125.

905. All prior paragraphs are re-alleged and incorporated as if set forth in full.

906. Defendants, in connection with their businesses, professions, PROFESSIONAL DUTIES, CONSPIRACIES and ENTERPRISE OPERATIONS, use in their advertisements, promotions, sale and offer for sale of their legal services words, terms, names, symbols, and devices, and combinations thereof, (COMMERCIAL SPEECH) which are false and misleading. 907. In their COMMERCIAL SPEECH DEFENANTS represent that their services abide by ordinary and professional standards of care, are legal, efficient, safe, and effective exercise of governmental powers and public licenses provided under law as follows per defendant:

Entity Misrepresentation/Reference All Defendants Each Defendant's COMMERCIAL SPEECH represents that their public and private services are legal, safe, efficient, obedient to PROFESSIONAL DUTIES and standards of care. JUDICIAL COUNCIL, ADMINISTRATIVE OFFICE OF THE COURTS,

910. The Claims of all Defendants described in this Count and elsewhere are false and misleading.

911. With respect to each Defendant: a. In their activities described herein, Defendants operate CRIMINAL

ENTERPRISES which defraud, abuse, oppress, and deprive Plaintiffs and the general public of their property and liberty. b. In their COMMERCIAL SPEECH promotion for such ENTERPRISES, including websites, literature, public appearances, statements and representations, Defendants misrepresent theirs and others' legal and professional services as legal, fair, honest, and beneficial, when in fact they are fraudulent, harmful, inefficient, oppressive, and illegal.

c. Further, in their advertising and promotion Defendants fail to warn consumers of the illegality of their services, the constitutional deprivations they cause and form the basis of liability for, and the many disastrous pitfalls which occur regularly from use of such professional services. As such, Defendants mislead as to the nature, characteristics, qualities, of their and their ENTERPRISE affiliates' services, including the nature of the ENTERPRISE with purpose..

- d. Defendants mislead consumers by misdirection from superior, legitimate, legal services by one or more, and by advising "that's how it is" in family court, and by failing to advise of the full options consumers have toward legal, healthy, and safe alternatives to avoid the abundant harm likely to befall those who engage in such activities.
- 912. Plaintiffs compete with Defendants for provision of legal services and as detailed in RICO ENTERPRISE allegations below.
- 913. Plaintiffs, their clients, and affiliates provide safe, legal, efficient, and healthier competing professional services in compliance with law. Defendants, by virtue of their illegal collusion, conspiracy, and coordination are competitively advantaged to overcharge for harmful, inefficient, oppressive, and unhealthy services. To protect such inefficient, illegal, and anticompetitive activities, Defendants have and continue to mislead consumers of PLAINTIFFS' and DEFENDANTS' services in their COMMERCIAL SPEECH. Plaintiffs reasonably believe they are likely to be misled and damaged by such COMMERCIAL SPEECH again in the future.
- 914. As an actual and proximate result PLAINTIFS have been injured in a nature an amount to be proven at trial.

### RICO ALLEGATIONS RICO DEFENDANTS

915. In addition to the allegations regarding each Defendant above, defendants are each engaged in activities which constitute Enterprise operations under the Racketeer Influenced and Corrupt Organizations Act of 1970 (RICO). The following entities are defined as a "person," as that term is defined pursuant to Section 1961(3) of RICO. Such Defendants include:
925. By virtue of their affiliations, associations, and collaboration as alleged herein, RICO Defendants function collectively as alter ego vehicles of one another facilitate and further the commercial purposes of the ENTERPRISES alleged herein.
926. Specifically, in addition to the conspiracy allegations detailed above, each defendant is liable as a principal pursuant to 18 U.S.C. § 2(a)-(b), and that each RICO person that is a RICO defendant is liable as a co-conspirator pursuant to 18 U.S.C. § 371.

927. Defendants, and each of them, while affiliated with one or more ENTERPRISES, have operated, affiliated with, and participated directly and indirectly in the conduct of ENTERPRISE affairs through a pattern of racketeering activity, in violation of 18 U.S.C. § 1964 (b), (c), and (d) as follows:

#### **RICO ENTERPRISES**

928. Each of the following configurations, for purposes of plaintiff RICO §1962(c) Claims for relief, constitute an enterprise engaged in, or the activities of which affect, interstate or international commerce as those term is defined pursuant to Title 18 United States Code §1961(4) of the Racketeer Influenced and Corrupt Organizations Act of 1970 ("RICO"), Odom v. Microsoft Corp., 486 F.3d 541 (9th Cir. 2007) and Boyle v. United States, 129 S. Ct. 2237 (2009) (collectively "RICO ENTERPRISES") The VSB, Judiciary, Government is organized and maintained by and through a consensual hierarchy of, managers, directors, officers, supervisors, agents, deputies, and/or representatives that formulate and implement policies relative to the dispensing and providing the rendition of judicial services to the public, including, but not restricted to, lawyers practicing before, networking with, funding, and collaborating with this enterprise, including, but not restricted to, aspects of family law, child custody, and domestic relations, acting in concert with one and others unknown to Plaintiffs, engaged in a course of conduct and a pattern of practice formulated, designed, intended, implemented, and executed to as part of one or more.

#### **GENERAL ENTERPRISE ALLEGATIONS**

#### With respect to each ENTERPRISE:

#### Commercial Purpose

946. The constituent members comprising each ENTERPRISE are engaged in a concerted campaign to extort, defraud, trick, deceive, corruptly persuade, victims, including primarily family court litigants and their children and extended families.
947. Further, in unfairly protecting their commercial purposes, each ENTERPRISE harasses, threatens, assaults, abuses, denigrates, impugn, and/or otherwise harms, threatens, and attempts to harm, competitors, critics, reformers, and others.
948. The ENTERPRISES operate as a "cabal," a semi private, sometimes secret, informal affiliation of entities with public presence and identity that is wholly or partially inaccurate and misleading as to the true goals, affiliations, and processes of the cabal. The ENTERPRISES achieve their respective purposes by fraudulent collusion among operators and affiliates, who in

their COMMERCIAL SPEECH represent to their clients that the relationships among the members are in compliance with legal and ethical PROFESSIONAL DUTIES when they in fact are not. See "False Flag" and "Poser Advocacy". (COMMERCIAL PURPOSES).

949. The ENTERPRISES also compete unfairly through their COMMERCIAL SPEECH by misrepresenting the legitimacy of the ENTERPRISES, by representing that their illegal behavior is "how it is" in a "take it or leave it" breach of one or more PROFESSIONAL DUTIES.

950. The ENTERPRISES also compete unfairly within the marketplace by creating the impression that non-ENTERPRISE entities are incapable of representing the interests of family law clients. In the present case, the ENTERPRISES operated as alleged to suppress and retaliate for Plaintiffs PUBLIC BENEFIT

ACTIVITIES by HARRASSMENT AND ABUSE to restrict the family law marketplace access, knowledge, and awareness to only ENTERPRISE operators and affiliates.

951. Funded by fraudulent exploitation of the ENTERPRISE operators and affiliates engage in bribery, exchanging value, emoluments, patronage, nepotism, and/or kickback schemes within their networks to assure system-wide "cash flow" and continued viability and vitality of the ENTERPRISES. ENTERPRISES refuse such cooperation with non-affiliates, thereby baring potential competitors. These bars include fraudulently manipulated referrals, representations, certifications, nepotism, illegal antitrust tactics, and manufactured pitfalls to support the pervasive "who you know" cabal in defiance of the rule of law.

952. When necessary, illegal marketplace protections are perpetrated by illegal criminal justice system sanctions by judicial officer, direct attacks such as the Janice Jailing and HARASSMENT AND ABUSE. This predatory competitive behavior targets any entity, association, or organization that supports and advocates for purposes, including Plaintiffs (ENTERPRISE UNFAIR COMPETITION).

## Scheme and Artifice to Defraud 1 False Flag breach of PROFESSIONAL DUTIES

984. Defendants have operators regularly breach one or more of their PROFESSIONAL DUTIES of loyalty, zealous advocacy, fiduciary responsibility, and professional competence through one or more "false flag" frauds to induce, deprive, or deceive These "False Flag" maneuvers involve one or more COMMERCIAL SPEECH misrepresentations, thereby depriving them of the benefits of legal professional services, and perpetrating fraud. "False Flag" schemes and artifices include: 985. Poser Advocacy: "Poser Advocacy" is the practice and sale of what appears to be the practice of law to the unsophisticated. Attorneys engaging in poser advocacy act to appeal to their client's emotions, greed, or other untoward ends to generate fees with no beneficial legal work performed. Poser advocates write angry letters ("paperwads"), exchange worthless formwork discovery, or repeatedly file baseless motions with no hope of success ("kite bombs"), to generate what looks like legitimate legal work to an unsophisticated acclimated to a daytime TV diet of Judge Judy drama and CSI suspense.

986. In the more sophisticated commercial legal marketplace, poser advocacy is not tolerated as clients insist, and attorneys abide by, legitimate practice and ethical standards. Because of the unique nature of the clients and market.

987. Yet given the nature of the marketplace and absence of awareness of the fraud, there is little incentive to eradicate its existence. Because it is highly profitable, even if illegal, it is therefore quietly encouraged. Because it can only exist in a market place where all players—the attorneys, professional service providers, and even judges—play along, it requires a "cabal" enterprise to be successful. Outsiders such as Plaintiffs who offer legal, safe, and far more efficient services are market spoilers, and as such are illegally targeted as described herein.

988. False Flag Collusion: Operatives regularly collude with erstwhile opponents—opposing counsel or entities representing the state, or at appropriate times working with or on behalf of the client or jointly with the client. Such collusion is a violation of one or more PROFESSIONAL DUTIES of loyalty, zealous advocacy to assert client rights adverse to other entitles, and fiduciary responsibility.

989. False Flag Abstention: fail to observe of assert for the client rights when under one or more PROFESSOINAL DUTIES to do so, failure to observe constitutional restrictions on use of color of law authority. Such failures in general include:

990. Failure to object to impermissible procedure, inadmissible evidence, and move to strike scandalous or impertinent matter;

991. Failure to insist on procedure consistent with the Virginia Code of Civil Procedure for motions;

992. Failure to seek sanctions for improper procedure;

993. Failure to object to unconstitutional laws, or processes harmful to their client;

- 994. Permitting or cooperating with Family Court or opposing counsel to misrepresent the rights and duties adverse to the client;
- 995. Otherwise failing to zealously represent the client's interests.

## RICO §1961(5) PATTERN OF RACKETEERING ACTIVITY ALLEGATIONS 18 U.S.C. § 1961(5)

#### COMMISSION OF RICO §1961(1)(B) RACKETEERING ACTIVITY:

1000. RICO Defendants engage in the following "racketeering activity," as that term is defined pursuant to 18 U.S.C. § 1961(5) ("RACKETEERING ACTIVITY"). RICO Defendants' RACKETEERING ACTIVITY as committing, aiding and abetting, or conspiring to commit, tens of thousands of violations of the following laws within the past ten years, including:

- A. Fraud and related activity in connection with identification documents, authentication features,
- B. and information: 18 U.S.C. § 1028;
- C. Mail Fraud: 18 U.S.C. § 1341
- D. Wire Fraud: 18 U.S.C. § 1343
- E. Bank Fraud: 18 U.S.C. § 1344
- F. Intangible Personal Property Right Deprivation: Title 18 U.S.C. § 1346.
- G. Influencing or injuring officer or juror generally: 18 U.S.C. § 1503;
- H. Obstruction of proceedings before departments, agencies, and committees: 18 USC § 1505;
- I. Obstruction of Criminal Investigations: 18 U.S.C. § 1510;
- J. Tampering with a witness, victim, or an informant: 18 U.S.C. § 1512;
- K. Retaliating against a witness, victim, or an informant: 18 U.S.C. § 1513;
- L, Peonage; obstructing enforcement: 18 U.S.C. § 1581,
- M. Enticement into slavery; 18 U.S.C. § 1583;
- N. Sale into involuntary servitude: 18 U.S.C. § 1584;
- O. Seizure, detention, transportation or sale of slaves: 18 U.S.C. § 1585;
- P. Service on vessels in slave trade: 18 U.S.C. § 1586;
- Q. Possession of slaves aboard vessel: 18 U.S.C. § 1587;
- R. Forced labor: 18 U.S.C. § 1589;
- S. Trafficking with respect to peonage, slavery, involuntary servitude, or forced labor: 18 U.S.C. § 1590;
- T. Unlawful conduct with respect to documents in furtherance of trafficking, pecnage, slavery, involuntary servitude, or forced labor: 18 U.S.C. 1592:
- U. Benefitting financially from peonage, slavery, and trafficking in persons: 18 U.S.C. § 1593A;

Conspiracy, attempt to commit acts of peonage, slavery, proscribed: 18 U.S.C. § 1594:

- W. Interference with commerce by threats or violence: 18 USC § 1951;
- X. Interstate and foreign travel or transportation in aid of racketeering enterprises: 18 U.S.C. § 1952;
- Y. Violent crimes in aid of racketeering activity: 18 U.S.C. § 1959
- Z. Principal and Aider and Abettor, Attempt, Conspiracy Liability: Title 18 U.S.C. § 2(a) and (b).

RACKETEERING COUNT 1 18 U.S.C. §§ 1962(c), (d) Frauds and Swindles 18 U.S.C. §§ 1341, 1343, 1344

1001. This is a Count asserting numerous Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable under 18 U.S.C. § 1341, 1343, and 1346 for Mail, Wire, and Bank Fraud, against defendants as identified per Claim in this Count.

1002. All prior paragraphs are re-alleged and incorporated as if set forth in full.

**General Allegations to Racketeering Count 1** 

1003. Defendants, having affiliated with one or more ENTERPRISE and devising or intending to devise one or more for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, delivered invoices, accountings, billing statements, letters, reports, and other correspondence into the U.S. mails, email, telephone facsimile to Janice.

1004. Such use of U.S. mails, emails, facsimile, and wire occurred as follows:

1005 That defendants mailed, emailed documents that were riddled with lies and untruths to protect one of there own Lawyer Ilona Grenadier Heckman.

1006 Lawyers / Defendants there agents on several occasions mislead and Obstructed Justice in the courts to protect one of their own.

RACKETEERING COUNT 2 18 U.S.C. §§ 1962(c), (d) Honest Services Fraud 18 U.S.C. § 1346 Against All RICO Defendants

1031. This is a Count asserting numerous Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable under 18 U.S.C. § 1346 for Honest Services Fraud, against defendants as identified per Claim in this Count. 1032. All prior paragraphs are re-alleged and incorporated as if set forth in full.

#### **General Allegations to Count 2**

1033. Defendants engaged in one or more Enterprise against Janice by and in conjunction with the ENTERPRISES to deprive Plaintiffs of the intangible right of honest services.

1034. On information and belief, Defendants, and each of them, support and promote one another in perpetrating each actionable fraud, bribery and/or kickbacks, wherein a quid pro quo (monetary, preferential referral, business referral, and/or some other form of benefit) is provided by the RICO defendants to persons unknown to plaintiffs to assure that Plaintiffs in their PUBLIC BENEFIT ACTIVITIES would be effectively punished, silenced, discredited, and rendered ineffective as an effectively competing alternative vehicle offering reasonable and realistic forms of professional quality services to counsel and advise individual parents and guardians addressing family law, child custody, and domestic relations issues.

1035. In the case of many of the Defendants, these quid-pro-quo exchanges are backed up with use of one or another, such as "that's just how it is" or extortion such as "if you ever want to see your girls again ...." which are enabled by the abuse of process tools of The Pit and abstention/enforcement of illegal Acts and ORDERS. In Janice's case, additional muscle was provided by the Sheriffs in torturing her while in jail.

1036. The fraudulent quid-pro-quo ignores ethical duties of loyalty and zealous advocacy among putative opponent lawyers, and judicial officials who disregard their ethically-required adversarial obligations and duties to enforce law to re-define their opponents as their own clients, take their opponents interests above their clients' collaborating with opposing counsel and state interests under color of law to extort, defraud, and abuse their own client base, whom they refer to as "Litigants Behaving Badly" in a grotesque and reprehensible criminal enterprise conducted with full knowledge, consent, and contribution from public and private servants alike. Or the hiring of Michael Stuart to drug and get sexual inappropriate pictures, to rape one of Janice's daughters, plant drugs in the home or on one of the girls this was by all appearance ordered by Judge Clark to give the appropriate evidence to make Janice Incompetent to file any other documents. Ilona, David, DiMuro and Wieser and others where in on the Scheme.

1037. Such conduct constitutes the deprivation of the intangible personal property right to receive 'honest-services' for purposes of 18 U.S.C. §§ 1341, 1343, and 1346.

1038. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 3 18 U.S.C. 1962(c), (d) Kidnapping

1039. This is a Count asserting Claims for Relief under 18 U.S.C. § 1962 (c) and (d) based upon commission of the predicate crimes of

1040. Each Claim for Relief in this Count is actionable as a predicate crime under 18 U.S.C. § 1961(1)(A) as "any act or threat involving ... kidnapping, ... robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

1041. Each act of each Defendant in each Claim in this Count was committed in conducting, participating in, conspiracy with, or aiding and abetting in furtherance of he purposes of each ENTERPRISE with which the Defendants is affiliated.

1042. At all times relevant to this Count, each Defendant hereto acted CULPABLY with knowledge of the illegal nature of the Janice Jailing and Kidnapping of Janice and her witness's by the Commonwealth Attorney Randy Sengel and Judge Bowen Potter to protect there own. Defendants' and each of their, intent to interfere illegally with Plaintiffs' PUBLIC BENEFIT ACTIVITIES and DUE ADMINISTRATION OF JUSTICE.

1043. At no time relevant to this Count did Janice act on his free will or consent.

1044. At no time relevant to this Count did any Defendant act with probable cause, good faith, or pursuant to lawful authority.

### RACKETEERING COUNT 4 Extortion

18 U.S.C. § 1951

1074. This is a Count against Defendants under 18 U.S.C. § 1962 (c) and (d), based upon predicate crimes of extortion under 18 U.S.C. § 1951 under 18 U.S.C. § 1961(1) (A) as "any act or threat involving ... kidnapping, ...robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

#### Racketeering Claim For Relief 4.1 Extertion, Robbery 18 U.S.C. § 1951

1075. This is a Claim against Defendants for extortion and robbery pursuant to 18 U.S.C. § 1951.

1076. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1077. Defendants, in committing each act described in the response to the CLAIM AND DEMAND, (d) MALICIOUS PROSECUTION and (e) PROSECUTORIAL MISCONDUCT, attempted, conspired, aided and abetted, and did obstruct, delay, and affect commerce or the movement of any article or commodity in commerce, namely, money and valuable things consisting of, inter alia, (1) money payments to lawyers for services never rendered., abandonment of the competitive PUBLIC BENEFIT ACTIVITES, and abandonment of the DUE ADMINISTRATION OF JUSTICE by robbery and extortion, committed and threatened physical violence to Janice and her girls PROPERTY in furtherance of a plan or purpose to extort and rob Janice, .

1078. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

Racketeering Claim For Relief 4.2

1079. This is a Claim against Defendants for extortion pursuant to a crime under 18 U.S.C. § 1961(1)(A) as "any act or threat involving ... kidnapping, ... robbery, bribery, extortion ... which is chargeable under State law and punishable by imprisonment for more than one year."

1080. All prior paragraphs are re-alleged and incorporated as if set forth in full.

1081. Defendants, and each of them, in committing each act alleged above, attempted, conspired, aided and abetted, and did obtain property, namely (1) payment of money and abandonment of money Claims relating to Divorce Lawyer Ilona (2) payment of money and abandonment of money Claims money Claims relating to Ilona, (3) abandonment of the competitive PUBLIC BENEFIT ACTIVITES, and (6) abandonment of the DUE ADMINISTRATION OF JUSTICE from Janice (1) induced by a wrongful use of force or fear (2) under color of official right in the (a) Ilona TERRORISM, (b) FRAUD, (c) the response to the CLAIM AND DEMAND, (d) MALICIOUS PROSECUTION and (e) PROSECUTORIAL MISCONDUCT. 1082. As an actual and foreseeable result, Janice has been damaged and injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 5
Obstruction of Justice
18 U.S.C. §§ 1982(c), (d)

1083. This is a Count asserting Claims for relief under RICO section 1962 (c) and (d), based upon predicate crimes actionable against Defendants identified in each Claim of this Count.

#### 18 U.S.C. § 1503 18 U.S.C. §§ 1962(c), (d) Obstruction of Justice Racketeering Claim for Relief 5.1

1084. All prior paragraphs are re-alleged and incorporated as if set forth in full. This is a Claim against Defendants for Influencing Or Injuring Officer Or Juror Generally pursuant to 18 U.S.C. § 1503.

and impede, Plaintiffs from continuing in their cooperation with the FEDERAL LAW ENFORCEMENT OFFICERS in force, and by threatening letter or communication, influenced, obstructed, and impeded, and endeavors to influence, obstruct, influence, infimidate, and impede Janice in performance of her PROFESSIONAL DUTIES, and corruptly or by threats or (4) OBSTRUCTION OF JUSTICE corruptly, by threats and force, by threatening letter or communication, endeavored to 1085. Defendants, by the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, (3) PROSECUTORIAL MISCONDUCT, and

1886. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial. pursuing the DUE ADMINISTRATION OF JUSTICE.

18 U.S.C. §§ 1362(c), (d) Obstruction of Justice Racketering Claim for Relief 5.2

18 U.S.C. § 1505

pursuant to 18 U.S.C. § 1505. 1867. This is a Claim against Defendants for Obstruction of proceedings before departments, agencies, and committees

1080. All prior paragraphs are re-alleged and incorporated as if set forth in full.

PROSECUTORIAL MISCONDUCT, and (4) OBSTRUCTION OF JUSTICE endeavored to and did influence, obstruct, or 1089. Defendants corruptly and by force or threat of force in the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, (3)

exercise of the power of inquiry under which any inquiry or investigation is being had by either House, or any committee of the DUE ADMINISTRATION OF JUSTICE before FEDERAL LAW ENFORCEMENT OFFICERS, and the due and proper impede Plaintiff PUBLIC BENEFIT ACTIVITES and

pursuant to PLAINIFF's PUBLIC BENEFIT ACTIVITIES before the Representatives of the United States. either House or any joint committee of the Congress of the United States

1990. As an actual and proximate result, Plaintiff have been damaged or injured in a nature and amount to be proven at trial.

18 U.S.C. § 1512(a) (b) (c) (d)( e) (2)(A), (B) (C) Tampering with a witness, victins, or informant – other harm 18 U.S.C. §§ 1962(c), (d) Racketeering Claim for Relief 5.3

1091. This is a Claim against Defendants for Tampering with a wimess, victim, or informant pursuant to 18 U.S.C. §

1213(a)(b)(c)(e)(3)(A),, (B), (C),

1093. Defendants, by the (1) lanice Jailing, (2) MALICIOUS PROSECUTION, (3) PROSECUTORIAL MISCONDUCT, and 1092. All prior paragraphs are re-alleged and incorporated as it set forth in full.

(4) OBSTRUCTION OF JUSTICE CULPABLY used and threatened use of physical

the testimony of Plaintiffs and her witness's, in THE DUE ADMINISTRATION OF JUSTICE, force, including confinement, against Janice, and the threat and attempted to do so, with intent to influence, delay, or prevent

including claims in a complaint that violated Janice United States Constitutional rights and federal eriminal law. 1112. Defendants' false, misleading, deceptive, concealing, or destroying behavior included disingenuous allegations, Attorney's Office, F.B.I, and others in the DUE ADMINISTRATION OF JUSTICE and PUBLIC BENEFIT ACTIVITIES thereby acting with an improper purpose to obstruct, thwart or mislead. Janice into diverting their contacts with the U.S. 1110. Defendants acted corruptly in making the fraudulent and coercive statements attributed to them in each section above,

1094. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

Conspiracy to Retaliate against a witness, victim, or an informant 18 U.S.C. §§ 1962(c), (d) Radestering Claim for Relief 5.4

#### 18 U.S.C. § 1513(f)

- 1127. This is a Claim against all RICO Defendants for Conspiracy to Retaliate against a witness, victim, or an informant to 18 U.S.C. § 1513(f).
- 1128. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1129. Defendants, and each of them, CULPABLY conspired with each other DEFENANT to commit each act described above.
- 1130. As an actual and foreseeable result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

#### RACKETEERING COUNT 6 18 U.S.C. §§ 1962(c), (d) Violent Crime in Aid of Racketeering 18 U.S.C. § 1959

- 1131. This is a Claim against Defendants by Janice for Violent Crime in Aid of Racketeering pursuant to 18 US.C. § 1959.
- 1132. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1133. Defendants in the (1) Janice Jailing, (2) MALICIOUS PROSECUTION, and (3) PROSECUTORIAL MISCONDUCT attempted, threatened, conspired, aided and abetted, and did kidnap, assaulted with a dangerous weapon, assaulted resulting in serious bodily injury upon, and threatened to commit a crime of

violence to Janice in violation of the laws of the State of Virginia and the United States, in exchange for (i) consideration, a promise or agreement to pay, pecuniary value, from each of the ENTERPRISES, or (ii) the purpose of gaining entrance to or maintaining or increasing position in each of the ENTERPRISES.

1134. As an actual and proximate result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

RACKETEERING COUNT 7
RICO Aiding and Abetting
18 U.S.C. §§ 2(a)-(b) and §1962(c))]
Against All RICO Defendants

- 1135. This is a Claim against all RICO Defendants for aiding and abetting primary contravention of 18 U.S.C. § 1962(c) under 18 U.S.C. § 2(a)-(b) and § 1962(c).
- 1136. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1137. Defendants employed the U.S. mails and/or federal interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants as alleged herein above.
- 1138. Defendants were knowledgeable and aware of the commission of the primary RICO contraventions committed.
- 1139. Defendants substantially assisted in the commission of the primary RICO contraventions by said defendants, thereby deriving a monetary benefit as a result thereof to the detriment of Plaintiffs,

#### **RICO Recovery**

1140. Plaintiffs pray, pursuant to Title 18 United States Code §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

# RACKETEERING COUNT 8 Aiding and Abetting a RICO Section 1962(d) Conspiracy 18 U.S.C. §§ 2(a)-(b) and §§1962(c)-1962(d) Against All RICO Defendants

1141. This is a Claim against all RICO Defendants for alding and abetting a RICO Section 1962(d) conspiracy in contravention of 18 U.S.C. § 1962(c), pursuant to 18 U.S.C. §§ 2(a)-(b) and 1962(c)-1962(d). 1142. All prior paragraphs are re-alleged and incorporated as if set forth in full.

- 1143. Defendants employed the United States mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants and other RICO Defendants and persons unknown to plaintiffs as alleged herein above.
- 1144. Defendants' actions constitute mediate causation resulting in exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1145. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.
- 1146. Defendants' conduct constitutes aiding and abetting a RICO §1962(d) conspiracy inasmuch as defendants: were associated with a criminal venture as alleged herein; participated in the criminal venture as something the defendants wished to bring about; and sought by their actions to make it succeed.
- 1147. Defendants were knowledgeable and aware of the commission of the primary RICO contraventions committed by others.
- 1148. Defendants substantially assisted in the commission of the primary RICO contraventions, thereby deriving a monetary benefit as a result to the detriment of Plaintiff.
- 1149. Defendants aided and abetted a RICO Section 1962(d) conspiracy between said defendants to contravene RICO Section 1962(c)) to injure and/or damage Plaintiffs' interests in business and/or property.
- 1150. Plaintiffs allege that Defendants are conspiratorially liable under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas* v. U.S., 522 U.S. 52 (1997) for the substantive RICO Section 1962(c)) contraventions committed by defendant inasmuch as Defendants:
  - engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity; are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)); engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)):
  - are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO §1961(5) pattern of racketeering activity; and,
  - The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

#### **RICO Recovery**

1151. Plaintiffs are entitled to recover, pursuant to Title 18 United States Code §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

# RACKETEERING COUNT 9 Conspiracy to violate 18 U.S.C. 1962(c) Pursuant to 18 U.S.C. § 1962(d)\ Pinkerton v. U.S., 328 U.S. 640 (1946) and Salinas v. U.S., 522 U.S. 52 (1997) Against All RICO Defendants

- 1152. This is a Claim against all RICO Defendants for commission of conspiratorial contravention of 18 U.S.C. § 1962(c) based on a conspiracy as defined under 18 U.S.C. § 1962(d), *Pinkerton v. U.S.*, 328 U.S. 640 (1946) and *Salinos v. U.S.*, 522 U.S. 52 (1997).
- 1153. All prior paragraphs are re-alleged and incorporated as if set forth in full. RICO Conspiratorial Liability- Mediate Causation Contentions
- 1154. In committing each act alleged, Defendants mutually agreed to engage in the aforementioned racketeering activities and/or other wrongful conduct giving rise to the RICO Section 1962(c) contraventions.
- 1155. The objective of that mutual agreement was to destroy Plaintiffs' interests in business and/or property.
- 1156. Such conduct constitutes contravention of 18 U.S.C. § 1962(d).
- 1157. Further, Defendants' actions are deemed to constitute mediate causation resulting with the exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1158. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.

- 1159. Defendants employed the U.S. mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by Defendants and other RICO persons unknown to plaintiff as alleged herein above.
- 1160. Defendants were aware of the commission of the primary RICO contraventions.
- 1161. Defendants substantially assisted in the commission of the primary RICO contraventions, thereby deriving a monetary benefit as a result to the detriment of Plaintiffs.
- 1162. Defendants aided and abetted a RICO Section 1962(d) conspiracy between said defendants to contravene RICO Section 1962(c)) to injure and/or damage plaintiffs' interests in business and/or property.
- 1163. Defendants are liable as conspirators as defined under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas v. U.S.*, 522 U.S. 52 (1997)] for the substantive
- RICO Section 1962(c)) contraventions committed by other Defendants inasmuch as Defendants:
  - engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity; are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c)); engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));
  - are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO § 1961(5) pattern of racketeering activity; and,
  - The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

#### **RICO Recovery**

1164. Plaintiffs are entitled to recover, pursuant to 18 U.S.C. §1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of each RICO ENTERPRISE.

#### **RACKETEERING COUNT 10**

Aiding and Abetting a Conspiracy to Contravene 18 U.S.C. § 1962(c) 18 U.S.C. § 1962(d)/Pinkerton v. U. S., 328 U.S. 640 (1946) and Salinas v. U. S., 522 U.S. 52 (1997)

Against All RICO Defendants

- 1165. This is a Claim for conspiracy to contravene 18 U.S.C. § 1962(c) by a conspiracy to commit aiding and abetting under 18 U.S.C. § 1962(c) and *Pinkerton v. U.S.*, 328 U.S. 640 (1946) and *Salinas v. U.S.*, 522 U.S. 52 (1997)
- 1166. All prior paragraphs are re-alleged and incorporated as if set forth in full. RICO Conspiratorial Liability—Mediate Causation Contentions
- 1167. At relevant times Defendants mutually agreed to engage in the aforementioned racketeering activities and/or wrongful conduct giving rise to the RICO  $\S$  1962(c) contraventions.
- 1168. The objective of that mutual agreement was to destroy Plaintiffs' interests in business and/or property.
- 1169. Such conspiratorial conduct constitutes contravention of RICO §1962(d).
- 1170. Defendants' actions constitute mediate causation resulting with the exertion of some causal effect upon other Defendants' conduct by virtue of the affiliating with one another for criminal purposes.
- 1171. Such criminal affiliation constitutes a voluntary act committed with a culpable mens rea that causes a societal harm and concomitant social harm.
- 1172. Defendants employed the U.S. mails and/or interstate wires, as well as engaged in racketeering activity as alleged herein, to aid and abet the primary RICO § 1962(c)) contraventions committed by other Defendants as alleged herein above. 1173. Each Defendant was aware of the commission of the primary RICO contraventions committed.
- 1174. Each Defendant substantially assisted in the commission of the primary RICO contraventions by defendants, thereby deriving a monetary benefit as a result to the detriment of plaintiffs.
- 1175. Plaintiffs allege that defendants are conspiratorially liable under *Pinkerton*, v. U.S., 328 U.S. 640 (1946) and *Salinas* v. U.S., 522 U.S. 52 (1997) for the substantive Section 1962(c)) contraventions committed by Defendants inasmuch as Defendants:

engaged in the fraudulent activities that constitute the RICO §1961(5) pattern of racketeering activity; are members of the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));

engaged in activities in furtherance of advancing and promoting the RICO §1962(d) conspiracy designed and intended to contravene RICO § 1962(c));

are members of the RICO §1962(d) conspiracy at and during the time frame the fraudulent activities were committed that constitute the RICO §1961(5) pattern of racketeering activity; and.

The offense fell within the scope of the unlawful agreement and could reasonably have been foreseen to be a necessary or natural consequence of the unlawful agreement.

#### **RICO Recovery**

1176. Plaintiffs are entitled to recover, pursuant to 18 U.S.C. § 1964(c)), treble damages in the amount to be determined by offer of proof at time of trial. Plaintiffs are also entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by defendants committed in furtherance of the ENTERPRISES

# RACKETEERING COUNT 11 Petition for Orders Dissolving RICO Enterprises 18 U.S.C. § 1964 §§ (a)-(b) Against All RICO Enterprises Only

- 1177. This is a Claim Against All RICO Enterprises for Orders of this Court dissolving each RICO Enterprise pursuant to 18 U.S.C. §§ 1964(a)-(b)
- 1178. All prior paragraphs are re-alleged and incorporated as if set forth in full.
- 1179. Plaintiffs respectfully petition the Court, pursuant to 18 U.S.C. §§ 1964(a)-(b) to issue an order immediately dissolving each identified RICO §1961(4) ENTERPRISE herein inasmuch as said RICO ENTERPRISES are each a mere subterfuge and/or alter ego vehicle for the afore mentioned RICO defendants to engage in felonious, fraudulent, corrupt, violent, and illegal conduct, as alleged herein.

#### **RICO Recovery**

1180. PLAINITFFS are entitled to recover, pursuant to 18 U.S.C. § 1964(c) treble damages in the amount to be determined by offer of proof at time of trial. PLAINITFFS are similarly entitled to recover attorneys' fees and costs of this litigation, as well as damages arising from lost profits and/or lost business opportunities attributable to the activities engaged in by Defendants committed in furtherance of the ENTERPRISES.

#### PROSPECTIVE RELIEF

1181. For each Count seeking prospective relief below, Plaintiffs allege:

#### FICRO COUNTS 1-22:

Fraud; Deprivation of Rights, Privileges and Immunities Pursuant to 42 U.S.C. Sections 241, 242, 371 Against Defendants acting under color of law

1182. This is an allegation that Defendants in committing the acts alleged in COUNTS 1-11 and RICO COUNTS 1-11, above, concurrently committed one ore move deprivations of Plaintiffs' rights, privileges, and immunities in violation of 18 U.S.C. §§ 242, 241, and 371. These allegations are relevant to Defendants' ENTERPRISE, conspiracy, and racketeering activity, and are the basis for Plaintiffs' Claims for prospective relief under 28 U.S.C. § 2201. As such violations are indictable federal offenses, and shall hereinafter be referred to as FEDERAL INDICTABLE CIVIL RIGHTS OFFENESES (FICRO). 1183. As part of their ongoing CIVIL and CRIMINAL CONSPIRACIES to deprive Plaintiff and others similarly situated of and other civil rights, Defendants have CULPABLY committed each Count and Claim for relief alleged herein in furtherance of the conspiracies alleged hereinabove, establishing the existence of the crimes, conspiracies, and enterprises alleged herein. 1184. Defendants' activities described herein constitute a conspiracy to commit one or more violations of the Family Federal Rights, actionable under the Civil Rights Criminal and Civil Statutes (FICRO CONSPIRACY). The purpose of the FICRO

CONSPIRACIES is to deprive Plaintiffs and those similarly situated of their rights, privilege, and immunities under the Constitution of United States by committing, causing, or contributing to, or ratifying each of the acts alleged against each DEFENANT.

1185. Defendants, and each of them, acted with specific knowledge of Plaintiff and PUBLIC BENEFIT ACTIVITIES.

1186. On information and belief, upon learning of each fact relating to Plaintiffs' PUBLIC BENEFIT ACTIVITIES,

Defendants coordinated efforts, shared knowledge, and shared a common purpose with one or more of the other Defendants so as to be the agents of on another in FICRO CONSPIRACY to retaliate against, disparage, harm, injure, Plaintiff because of the same.

1187. In carrying out the FICRO CONSPIRACY, DEFENANTS committed, were aware of, acquiesced to, intended, and ratified each act and/or the acts and/or omissions of each other Defendant.

1188. Defendants are or were co-workers, collaborators, co-owners, cooperators, affiliates, colleagues, members of one another's personal and professional networks of one or more other of Defendants.

1190. Defendants, and each of them, in committing or conspiring to commit the acts ascribed to them CULPABLY acted in furtherance of the CRIMINAL CONSPIRACY, including the ENTERPRISES, entities, color of law, misfeasance and malfeasance ascribed to them herein.

1191. As an actual and foreseeable result, Plaintiffs have been damaged or injured in a nature and amount to be proven at trial.

PROSPECTIVE RELIEF COUNT 1

#### Declaratory Judgment Pursuant to 28 U.S.C. § 2201

#### Against All Defendants

1198. A case of actual controversy between Defendants and Plaintiffs exists with regard to Plaintiffs' free exercise, reform and support and advocacy of Family Federal Rights, laws, and Constitution of the Unites States, and the validity of state law conflicting therewith.

1199. Specifically, Plaintiffs, by virtue of their actions detailed herein, have asserted, and Defendants, by virtue of the Janice Jailing, MALICIOUS PROSECUTION, PROSECUTORIAL MISCONDUCT, and the operation of the ENTERPRISES with which they are affiliated, including their obstructive behavior

described herein, have contested and denied, the following rights:

Rights to SUBSTANTIVE DUE PROCESS by CULPABLE and UNREASONBLE breach of PROFESSIONAL DUTY under color of law detailed above.

1200. Further, by similar means, DEFENANTS have asserted, and Plaintiffs have denied the legality of certain laws, practices, procedures, rules, and forms in Family Law matters as the right to property owed and moneys owed by virtue of lack of a property settlement and divorce attorney Ilona in her Scheme to steal from Janice using a lawyer not licensed in Virginia to steal.:

The processes, procedures, rules, customs, and practices of Virginia and their offices statewide; 1201. Plaintiffs respectfully request an Order declaring Plaintiffs' rights and other legal relations vis-à-vis Defendants' HARRASSMENT AND ABUSE and other deprivation of Family Federal Rights as follows:

Superior to any state laws which conflict, hinder, or deprive PLAINTFFS of the same.

That no Defendant acting under color of law is may to deprive any U.S. Citizen residing or present in the State of Virginia of Federal Rights by reliance on conflicting state law, even in good faith;

That Defendants acting under color of law are not entitled to immunity under federal law for acts not specifically authorized by their constitutions, charters, or other foundational documents;

That all laws, rules, policies, regulations, and forms based thereon which conflict, hinder, or deprive Plaintiffs of their Federal Rights, including those specified herein, are unconstitutional, invalid, and unenforceable;

That the EQUAL PROTECTION CLASSES are valid classes of persons entitled to heightened protection under the 5th and 14th Amendments to the United States Constitution with regard to all Defendants;

That Defendants have violated each of the FICRO COUNTS as alleged against each of them herein; and That SUPERVISING DEFENANTS and MUNICIPAL ENTITIES behaviors, policies, and procedures depriving of or infringing on Federal Rights are illegal, unconstitutional, and deliberately indifferent to the likelihood of Constitutional injury to Plaintiffs:

1202. Plaintiff further request that the Court exercise its equitable powers pursuant to the Civil Rights Criminal and Civil Statutes and F.R.C.P. Rules 57 and 65 to enjoin defendants from:

Further deprivation of the Federal Rights;

Further HARRASSMENT AND ABUSE;

Further actions to solicit, prepare, file, petition for, issue, grant, or enforce Orders from Judge's that did not have Jurisdiction. ORDERS, forms, rules, advice, practices related thereto; and Further interference with any Plaintiffs' and any United States Citizen's exercise and enjoyment of her United States Constitutional Rights

1203. Plaintiff Janice further requests the Court to exercise its equitable powers pursuant to the Civil Rights Criminal and Civil Statutes and F.R.C.P. Rules 57 and 65 to enjoin

#### **RELIEF REQUESTED**

WHEREFORE Plaintiffs pray for judgment as follows: An award of compensatory, punitive, exemplary, and enhanced damages and interest thereon according to proof at trial; That Plaintiff will be able to show a loss of \$150 Million or more from the Direct Actions of the Defendants.

An award of reasonable costs and expenses incurred in this action, including counsel fees and expert fees as allowable under the Title 18, 28, and 42 sections asserted;

Declaratory, Injunctive, and Prospective Relief as requested including injunctive remedies provided under 42 U.S.C. §§ 1983, 1985, 1986, 1988; and 18 U.S.C. §§ 1964 (a), (c), and (d); 28 USC 2201-2202; 15 U.S.C. § 1125, and related federal statutes;

The Basic Liberty of Due Process has been violated. The basic liberty that our Flag stands for and here is where the standard of Liberty is set for the rest of the World. It is under the Oath that each Judge has taken that this heavy burden lies on your shoulders to protect the Rights of each and every American Citizen. That the Appearance of Justice is just as important as Justice itself. That our young men and women are in harms way in many countries fighting for rights Janice has been raped of by the defendants. That as Americans if this is not taken very serious we will end up as Nazi Germany did. That jailing a Jewish person and taking away all there fundamental rights is how it started. What has happened here to Janice for being Catholic and poor is no different then how it started in Germany.

The result of this unusual absence of checks and balances has become a "perfect storm" of unchecked power, absence of meaningful oversight, and financially-motivated professionals who operate the system—lawyers, city/ county-level bureaucrats, none of whom are open to input from litigants. Litigants encounter the system as a revolving door process with short term goals. There is no longer term litigant-side input to protect the legal and ethical integrity of the processes which deployed and policed by the system operators themselves. The resulting exploitation ruins the American Citizen and there families while enriching attorneys, governments, elected officials and judges who administer the processes they, and they alone, created.

That the acts and actions were knowledgeable, willful acts malicious, violent, oppressive, fraudulent, wanton, or grossly reckless were done with an evil attempt to silence me first from collecting money and property (Real Estate) that is and was rightfully mine, from Divorce Lawyer Ilona Ely Freedman Grenadier Heckman active member of the Old Boys Network, then to silence me from exposing what was being done to me so that Senator Mark Warner could and would be re-elected. The acts and actions began on February 14, 1986, and became obvious to the inclusion of

those below in September of 2007 and continue today. That I – Janice have a claim for these criminal and civil acts damages due me are Exemplary / Punitive, Compensatory, Consequential, Normal, Treble, Liquidated and Special Damages.

#### **JURY TRIAL DEMANDED**

Plaintiff incorporates by reference the allegations of above and all paragraphs

Plaintiff demands a Jury Trial, pursuant to the Seventh Amendment to the United States Constitution. Along with the hearing to be filmed by a Camera man of the choosing of Plaintiff Janice.

I, Janice Wolk Grenadier, am the Plaintiff in this action. I hereby declare under penalty of perjury that each of said allegations is true and correct.

Date: May 6, 2018

- / V/

Janice Wolk Grenadier
15 West Spring Street
Alexandria Virginia 2226

Alexandria, Virginia 22301 Telephone (202) 368-7178

Email jwgrenadier@gmail.com

CERTIFICATION: I declare under penalty and perjury: That No attorney has prepared or assisted in the preparation of this deciment. Janica Wolk Grenadier - Name of Pro Se Party.

May # 2018